

## PRIVACY POLICY – February 2025

**Newform** ("we," "us," or "our") is committed to protecting the privacy of individuals who interact with our artificial intelligence (AI) products and services. This Privacy Policy outlines how we collect, use, disclose, and protect your personal information in compliance with the UAE's Federal Law No. 45 of 2021 on the Protection of Personal Data (the "PDPL").

### 1. Information We Collect

We may collect the following types of personal information:

- **Personal Identifiers:** Name, email address, phone number, address, government-issued identification numbers (when necessary).
- **Customer Records Information:** Information you provide to us when interacting with our products or services, such as inquiries, feedback, or support requests.
- **Usage Data:** Information about how you use our AI products and services, including interactions with our website, apps, and AI models. This may include device information, IP address, browser type, operating system, and usage patterns.
- **Inference Data:** Information that our AI models may infer or generate based on your interactions with our products and services. This may include insights, predictions, or classifications.
- **Other Information:** Any other information you choose to provide to us, such as through surveys or feedback forms.

### 2. How We Use Your Information

We may use your personal information for the following purposes:

- **Providing and Improving Services:** To operate, maintain, and improve our AI products and services, including personalizing your experience.
- **Communication:** To respond to your inquiries, provide support, and send you important updates or notifications.
- **Research and Development:** To analyze data and conduct research to improve our AI models and develop new products and services.
- **Marketing:** To provide you with information about our products and services that may be of interest to you, subject to your consent and applicable laws.
- **Legal Compliance:** To comply with applicable laws and regulations, including the PDPL.

### 3. Legal Basis for Processing

We process your personal information based on the following legal grounds:

- **Consent:** Where you have provided your explicit consent for a specific purpose.
- **Contractual Necessity:** Where the processing is necessary to perform a contract with you or to take steps at your request prior to entering into a contract.
- **Legal Obligation:** Where the processing is necessary to comply with a legal obligation.

- **Legitimate Interests:** Where the processing is necessary for our legitimate interests, such as improving our services or protecting against fraud, provided that these interests are not overridden by your fundamental rights and freedoms.

#### 4. Disclosure of Your Information

We may disclose your personal information to the following categories of recipients:

- **Service Providers:** Third-party service providers who assist us in providing our services, such as data storage, analytics, and customer support. We have contracts with these providers requiring them to protect your information.
- **Government Authorities:** When required by law or legal process.
- **Business Transfers:** In connection with a merger, acquisition, or sale of all or a portion of our assets.

#### 5. Data Security

We implement appropriate technical and organizational measures to protect your personal information against unauthorized access, use, disclosure, alteration, or destruction.

#### 6. Your Rights

Under the PDPL, you have the following rights:

- **Right of Access:** To request access to your personal information.
- **Right of Rectification:** To request correction of inaccurate or incomplete information.
- **Right of Erasure:** To request deletion of your personal information, subject to certain exceptions.
- **Right to Restriction of Processing:** To request restriction of processing of your personal information.
- **Right to Data Portability:** To receive your personal information in a structured, commonly used, and machine-readable format.
- **Right to Object:** To object to the processing of your personal information based on legitimate interests or for direct marketing purposes.

#### 7. Contact Us

If you have any questions or concerns about this Privacy Policy or our data practices, please contact us at: [info@newformglobal.com](mailto:info@newformglobal.com)

#### 8. Updates to this Privacy Policy

We may update this Privacy Policy from time to time. We will post any changes on our website and as required by law.