

WEBSITE PRIVACY POLICY

Privacy Policy

Effective Date: April 27, 2025

1. INTRODUCTION

RevoPro AI Artificial Intelligence Developing Services ("RevoPro AI," "Company," "we," "us," or "our") is firmly committed to ensuring the highest standards of privacy, security, and protection of Personal Data entrusted to us by clients, visitors, users, and other natural persons ("you," "your").

This Privacy Policy ("Policy") governs the principles, obligations, rights, and practices associated with the collection, recording, organization, storage, adaptation, alteration, retrieval, consultation, use, disclosure, dissemination, restriction, erasure, or destruction ("Processing") of your Personal Data in relation to the use of our website located at www.revopro.ai ("Website") and the services offered therein ("Services").

In all Processing activities, RevoPro AI acts as a **Data Controller**, as defined under:

- **Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data** (United Arab Emirates) ("UAE Data Protection Law"),
- **Regulation (EU) 2016/679** of the European Parliament and of the Council of 27 April 2016 ("General Data Protection Regulation" or "GDPR"),
- Any other applicable regional or international data protection statutes, codes, or regulations.

Accordingly, RevoPro AI processes Personal Data in compliance with fundamental legal principles, including but not limited to:

- **Lawfulness, Fairness, and Transparency** (Article 5(1)(a) GDPR; Article 4 UAE Data Law),

- **Purpose Limitation** (Article 5(1)(b) GDPR),
- **Data Minimization** (Article 5(1)(c) GDPR),
- **Accuracy and Rectification** (Article 5(1)(d) GDPR),
- **Storage Limitation** (Article 5(1)(e) GDPR),
- **Integrity and Confidentiality** (Article 5(1)(f) GDPR),
- **Accountability** (Article 5(2) GDPR; Articles 6 and 7 UAE Data Law).

RevoPro AI recognizes that the protection of Personal Data is not only a legal obligation but also a core element of fostering trust and ethical responsibility.

Our Processing activities are designed to ensure that Personal Data is:

- Collected for explicit, specified, and legitimate purposes;
- Processed lawfully under appropriate legal bases (e.g., consent, contractual necessity, legitimate interests, legal obligations);
- Protected through robust technical and organizational measures proportionate to the nature, scope, context, and purposes of Processing.

This Policy establishes:

- The categories of Personal Data we collect;
- The lawful bases and purposes for which we process Personal Data;
- The technical and organizational measures we implement to protect Personal Data;
- Your rights as a Data Subject under applicable data protection frameworks;
- The channels through which you may exercise your rights or raise inquiries.

RevoPro AI further undertakes to ensure:

- Prompt notification to Supervisory Authorities and Data Subjects of any personal data breach as required by Article 33 and 34 GDPR and Articles 7–9 UAE Data Law;
- Lawful cross-border transfers pursuant to Article 46 GDPR and UAE Cabinet Decision No. 32 of 2022;
- Execution of binding data protection agreements with all processors pursuant to Article 28 GDPR and Article 18 UAE Data Law.

By accessing or using the Website and our Services, you acknowledge that you have read and understood this Privacy Policy and agree to the Processing of your Personal Data in accordance with the terms and conditions set forth herein.

2. DEFINITIONS

Unless otherwise expressly stated herein, capitalized terms used in this Privacy Policy shall have the following meanings:

- **"Personal Data"** means any information relating to an identified or identifiable natural person, as defined under Article 4(1) of the General Data Protection Regulation (GDPR) and Article 1 of the UAE Data Protection Law. An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, identification number, location data, online identifier, or one or more specific factors related to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.
- **"Processing"** means any operation or set of operations performed upon Personal Data, whether or not by automated means, including but not limited to collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, alignment or combination, restriction, erasure, or destruction, as defined under Article 4(2) GDPR and Article 1 UAE Data Law.

- **"Data Controller"** means the natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data. For the purposes of this Policy, RevoPro AI acts as the Data Controller in accordance with Article 4(7) GDPR and Article 2 UAE Data Law.
- **"Data Subject"** means the identified or identifiable natural person to whom the Personal Data relates.
- **"Third-Party Processor"** means any external natural or legal person, public authority, agency, or other body which Processes Personal Data on behalf of RevoPro AI pursuant to a binding written agreement that ensures compliance with Article 28 GDPR and Article 18 UAE Data Law requirements regarding security, confidentiality, and lawful Processing instructions.
- **"Supervisory Authority"** means an independent public authority established under Article 51 GDPR or the UAE Data Office established under Federal Decree-Law No. 45 of 2021, responsible for monitoring the application of data protection laws and ensuring compliance therewith.
- **"Consent"** means any freely given, specific, informed, and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by clear affirmative action, signifies agreement to the Processing of Personal Data, as defined under Article 4(11) GDPR and Article 6 UAE Data Law.
- **"Personal Data Breach"** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data transmitted, stored, or otherwise processed, as defined in Article 4(12) GDPR and Article 7 UAE Data Law.
- **"Profiling"** means any form of automated Processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that person's

performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements, in accordance with Article 4(4) GDPR.

- **"Cross-Border Data Transfer"** means the transfer of Personal Data outside the territory of the United Arab Emirates to a foreign jurisdiction in compliance with Cabinet Decision No. 32 of 2022 and Articles 22–24 UAE Data Law, or under Articles 44–50 GDPR.

3. COLLECTION OF PERSONAL DATA

3.1 Overview

RevoPro AI collects and processes Personal Data strictly in accordance with the principles of lawfulness, fairness, and transparency as required by Article 5(1)(a) GDPR and Article 4 of the UAE Data Protection Law.

The categories of Personal Data we collect, the purposes for which we process such data, and the corresponding lawful bases for Processing are set forth below:

3.2 Categories of Personal Data Collected

Category	Examples	Purpose of Processing	Lawful Basis for Processing
Identification Information	Full name, Company name	Account creation, service provision, client relationship management	Article 6(1)(b) GDPR (performance of contract); Article 4 UAE Data Law
Contact Information	Email address, Phone number, Business address	Notifications, customer support communications, billing	Article 6(1)(b) GDPR (performance of contract); Article 4 UAE Data Law
Business Information	CRM entries, Lead generation data, Use case descriptions	Tailoring AI agents to specific business needs, product customization	Article 6(1)(f) GDPR (legitimate interests)

Payment Information	Billing address, Payment method details, Transaction history (processed securely via Stripe)	Payment processing, fraud prevention, accounting, financial compliance	Article 6(1)(c) GDPR (legal obligation); Article 8 UAE Data Law
Technical and Device Information	IP address, Browser type and version, Operating system, Cookies data, Device identifiers	Ensuring Website security, enhancing user experience, conducting analytics and diagnostics	Article 6(1)(a) GDPR (consent) for non-essential cookies; Article 6(1)(f) GDPR (legitimate interests) for security operations
Usage Data	Dates and times of access, Interaction logs, Navigation patterns	Website performance optimization, marketing analysis (in anonymized or aggregated form)	Article 6(1)(f) GDPR (legitimate interests)

3.3 Special Categories of Personal Data

RevoPro AI does **not intentionally collect or process** any Special Categories of Personal Data (as defined in Article 9 GDPR), such as:

- Racial or ethnic origin,
- Political opinions,
- Religious or philosophical beliefs,
- Genetic or biometric data for identification,
- Health-related data,
- Sexual orientation.

Should Special Categories of Personal Data be inadvertently collected, it will be immediately deleted unless Processing is required under an explicit exception under Article 9(2) GDPR or corresponding UAE laws.

3.4 Sources of Personal Data

We collect Personal Data from the following sources:

- Directly from you (via online forms, website waitlist, email communications, client onboarding),
- Automatically from your interaction with the Website (via cookies, server logs, analytics tools),
- From authorized third-party services you choose to connect (e.g., Stripe payment portal, CRM tools such as Airtable),
- Publicly available sources, where legally permissible.

3.5 Lawfulness of Processing

All Processing activities conducted by RevoPro AI are based on one or more of the lawful bases specified under Article 6 GDPR and Article 4 UAE Data Law, specifically:

- **Performance of a Contract** (e.g., to provide services you request),
- **Compliance with Legal Obligations** (e.g., accounting, invoicing),
- **Legitimate Interests** (e.g., security, service improvement),
- **Consent** (e.g., for analytics or marketing communications where required).

Where consent forms the basis for Processing, you have the right to withdraw your consent at any time without affecting the lawfulness of prior Processing.

4. METHODS OF DATA COLLECTION

RevoPro AI collects Personal Data through multiple lawful means, in accordance with the principles of lawfulness, fairness, and transparency set forth in Article 5(1)(a) GDPR and Article 4 UAE Data Protection Law.

We obtain Personal Data through the following methods:

4.1 Direct Voluntary Submission

We collect Personal Data that you voluntarily provide to us when:

- Filling out online forms on our Website (e.g., contact forms, waitlist registrations, onboarding questionnaires),
- Communicating with us via email, telephone, or other channels,
- Submitting written information such as business descriptions, documents (e.g., PDFs), or supplementary data for AI agent customization,
- Participating in promotional events, surveys, webinars, or informational sessions.

Such submissions are provided voluntarily, and, where necessary under applicable law, based on your explicit consent under Article 6(1)(a) GDPR.

4.2 Automated Collection via Technological Means

We collect certain Personal Data automatically when you access or interact with our Website, through mechanisms including but not limited to:

- **Cookies and similar tracking technologies** (in accordance with our Cookie Policy),
- **Web server logs**, recording technical information such as IP address, browser type and version, operating system, and access times,

- **Session monitoring and analytics tools**, which capture navigation data, page views, and interaction events for legitimate interest purposes related to service improvement (Article 6(1)(f) GDPR).

Where required by applicable law (e.g., for non-essential cookies), your prior consent will be obtained before such technologies are employed.

4.3 Third-Party Service Providers

We may obtain Personal Data indirectly through integrations with authorized Third-Party Processors, including:

- **Payment processors** (e.g., Stripe) for billing and transaction verification,
- **Database and hosting providers** (e.g., Supabase, Airtable) for storing form submissions, CRM entries, and client onboarding information,
- **Automation platforms** (e.g., Make.com) for workflow and service optimization,
- **E-signature providers** (e.g., Adobe Sign) for contract execution and validation.

These third parties act under contractual agreements imposing obligations equivalent to those required under Article 28 GDPR and Article 18 UAE Data Protection Law, ensuring that your Personal Data is handled securely, confidentially, and solely for authorized purposes.

4.4 Publicly Available Sources

Where permissible by applicable law, we may collect Personal Data from publicly available sources, such as:

- Corporate websites,
- Public social media profiles (e.g., LinkedIn),
- Government registries,
- Business directories.

This data is processed strictly for the purposes compatible with those for which the information was initially disclosed publicly.

4.5 Mobile and Communication Applications (Future Expansion)

In the event that RevoPro AI deploys mobile applications, messaging bots, or other communication tools in the future, additional data collection methods may apply, subject to updates to this Policy and, where appropriate, your express consent.

5. PURPOSES OF PROCESSING

RevoPro AI processes Personal Data lawfully, fairly, and transparently in strict adherence to the principles set forth in Article 5 GDPR and Article 4 of the UAE Data Protection Law.

The purposes for which we process Personal Data, together with the applicable lawful bases under data protection legislation, are outlined below:

5.1 Contractual Necessity (Article 6(1)(b) GDPR; Article 4 UAE Data Law)

We process Personal Data where necessary for the performance of a contract to which the Data Subject is a party or to take pre-contractual steps at the Data Subject's request, including:

- Delivering and maintaining AI agent solutions;
- Implementing CRM integrations;
- Providing customer support, technical assistance, and service updates.

Failure to provide such Personal Data may prevent us from delivering the contracted services.

5.2 Compliance with Legal Obligations (Article 6(1)(c) GDPR; Article 8 UAE Data Law)

We process Personal Data as necessary to comply with statutory obligations under applicable laws and regulations, including:

- Financial recordkeeping in accordance with UAE Commercial Law and VAT regulations;
- Taxation reporting and audit requirements;
- Regulatory compliance, fraud prevention, and anti-money laundering measures where applicable.

5.3 Legitimate Interests (Article 6(1)(f) GDPR; Article 5 UAE Data Law)

We may process Personal Data where such processing is necessary for the purposes of legitimate interests pursued by RevoPro AI, provided that such interests are not overridden by the fundamental rights and freedoms of the Data Subject.

Such legitimate interests include:

- Improving, optimizing, and developing our services and platform;
- Securing and safeguarding our systems and networks from unauthorized access or misuse;
- Conducting internal analytics and business intelligence operations;
- Marketing communications to existing clients (subject to applicable direct marketing regulations).

Where Legitimate Interests are relied upon, we undertake balancing tests to ensure that such processing is proportionate and minimally invasive.

5.4 Consent (Article 6(1)(a) GDPR; Article 6 UAE Data Law)

Certain Processing activities are based on your explicit consent, obtained separately, including:

- The use of analytical or marketing cookies and similar tracking technologies;

- Subscription to newsletters, promotional updates, or waitlist notifications;
- Public testimonial collection (e.g., Free Build Program clients).

You have the right to withdraw your consent at any time without affecting the lawfulness of Processing carried out before withdrawal.

5.5 Other Lawful Grounds

Where applicable, we may process Personal Data pursuant to additional lawful bases, including:

- Protection of vital interests (Article 6(1)(d) GDPR) in case of urgent matters relating to the safety or security of individuals;
- Public interest or official authority (Article 6(1)(e) GDPR) where mandated by applicable legislation.

6. STORAGE, SECURITY, AND SAFEGUARDS

6.1 Data Storage Locations

Personal Data collected by RevoPro AI is securely stored using trusted Third-Party Processors operating under stringent data protection agreements, including:

- **Supabase** (primary data storage, client form submissions),
- **Airtable** (CRM systems and client interaction records),
- **Stripe** (payment processing information),
- **Netlify** (website hosting and server-side functionality).

All Third-Party Processors are contractually bound to adhere to confidentiality obligations and data security standards compliant with Article 28 GDPR and Article 18 UAE Data Law.

6.2 Technical and Organizational Security Measures

RevoPro AI implements appropriate technical and organizational measures ("TOMs") to ensure a level of security appropriate to the risk, including but not limited to:

- **End-to-End Encryption:** Secure transmission and storage of Personal Data using advanced encryption protocols (e.g., TLS 1.3, AES-256).
- **Role-Based Access Controls (RBAC):** Limitation of access to authorized personnel on a strict need-to-know basis.
- **ISO/IEC 27001-Aligned Security Frameworks:** Adherence to internationally recognized information security standards.
- **Regular Vulnerability Scans and Penetration Testing:** Proactive identification and mitigation of security threats.
- **Real-Time Security Monitoring:** Deployment of intrusion detection and prevention systems (IDPS) to monitor and respond to incidents swiftly.
- **Automated Backup Systems:** Routine encrypted backups with disaster recovery protocols.

These measures are reviewed and updated regularly in line with evolving technological standards and regulatory requirements.

6.3 Data Breach Notification Procedures

RevoPro AI maintains comprehensive incident response protocols, including:

- **Immediate Assessment:** Any suspected or actual Personal Data Breach is promptly assessed for potential risk to Data Subjects.
- **Notification to Supervisory Authorities:** Where a Personal Data Breach is likely to result in a risk to the rights and freedoms of natural persons, RevoPro AI shall notify the UAE Data Office or the competent Supervisory Authority without

undue delay and, where feasible, no later than seventy-two (72) hours after becoming aware of the breach (Article 33 GDPR; Article 7 UAE Data Law).

- **Notification to Data Subjects:** Where the breach is likely to result in a high risk to the rights and freedoms of Data Subjects, RevoPro AI shall also communicate the breach to the affected Data Subjects without undue delay (Article 34 GDPR).

Such notifications shall include the nature of the breach, likely consequences, measures taken or proposed to mitigate adverse effects, and contact information for further inquiries.

7. DATA SHARING AND TRANSFERS

RevoPro AI maintains strict protocols regarding the sharing and disclosure of Personal Data.

Personal Data shall only be disclosed where necessary, lawful, and subject to appropriate contractual and security safeguards, in accordance with Article 28 GDPR, Articles 18 and 19 of the UAE Data Protection Law, and other applicable standards.

We may share Personal Data under the following circumstances:

7.1 Third-Party Processors

We engage trusted Third-Party Processors under binding written agreements that impose:

- Duties of confidentiality and security,
- Restrictions on Processing activities to the specified purposes,
- Requirements for technical and organizational data protection measures,
- Compliance with Article 28 GDPR and Article 18 UAE Data Law obligations.

Examples of Third-Party Processors include but are not limited to:

- Supabase (data storage),
- Airtable (CRM database management),

- Stripe (payment processing),
- Netlify (hosting services),
- Make.com (workflow automation).

7.2 Legal Requirements and Regulatory Compliance

We may disclose Personal Data where legally required to:

- Comply with obligations under applicable law,
- Respond to lawful requests from public authorities or courts,
- Cooperate with regulators or supervisory authorities, including but not limited to the UAE Data Office, tax authorities, or financial services regulators.

Disclosures shall be limited to the minimum amount of Personal Data necessary for compliance.

7.3 Business Transfers

In the event of a corporate reorganization, merger, acquisition, sale, or other transfer of all or part of our business assets, Personal Data may be transferred to the successor entity, subject to:

- The successor assuming all data protection obligations under this Privacy Policy,
- Continued protection of Personal Data consistent with applicable laws,
- Notification to affected Data Subjects where required.

7.4 Prohibition on Sale of Data

RevoPro AI does not sell, lease, rent, or otherwise commercially disclose Personal Data to third parties for monetary or other valuable consideration.

8. INTERNATIONAL TRANSFERS

Where Personal Data is transferred outside the jurisdiction of the United Arab Emirates or the European Economic Area (EEA), RevoPro AI ensures that such transfers are conducted in strict compliance with cross-border data transfer laws and safeguards, specifically:

8.1 Standard Contractual Clauses (SCCs)

Transfers may occur under Standard Contractual Clauses (SCCs) approved by the European Commission pursuant to Article 46(2)(c) GDPR, supplemented where necessary to comply with UAE cross-border data transfer rules under Cabinet Decision No. 32 of 2022.

8.2 Adequacy Decisions

Transfers may be based on an adequacy decision issued by the European Commission or the UAE Data Office, confirming that the recipient jurisdiction ensures an adequate level of protection for Personal Data (Article 45 GDPR; Article 22 UAE Data Law).

8.3 Other Appropriate Safeguards

Where neither SCCs nor adequacy decisions apply, we may rely on other legally recognized safeguards, such as:

- Binding Corporate Rules (BCRs),
- Explicit, informed, and voluntary consent by the Data Subject (Article 49(1)(a) GDPR),
- Necessity for the performance of a contract (Article 49(1)(b) GDPR).

Where explicit consent is relied upon, it shall be obtained separately and clearly distinguished from other matters.

8.4 Consent for Transfers

By accepting this Privacy Policy and using our services, you explicitly consent to the international transfer of your Personal Data to jurisdictions that may not provide the same level of protection as your home jurisdiction, to the extent necessary for the provision of services.

You retain the right to withdraw such consent at any time by contacting

business@revopro.ai.

9. DATA RETENTION AND DELETION

RevoPro AI adopts strict data retention and deletion policies, ensuring that Personal Data is not kept for longer than necessary for the purposes for which it was collected, or as otherwise required by law.

9.1 Retention Periods

We retain Personal Data for:

- The duration of the contractual relationship with the Client;
- Such additional period as may be necessary for compliance with:
 - UAE Commercial Companies Law,
 - UAE Tax Procedures Law,
 - UAE Anti-Money Laundering and Combating Financing of Terrorism regulations,
 - GDPR or equivalent record-keeping obligations.

9.2 Data Deletion Upon Request

Upon the termination of the contractual relationship or upon the Client's written request, RevoPro AI shall:

- Erase or anonymize Personal Data, subject to applicable legal retention exceptions,
- Erase Personal Data in accordance with the Right to Erasure under Article 17 GDPR and Article 8 UAE Data Law.

Exceptions where deletion may not occur immediately include:

- Compliance with legal obligations;
- Establishment, exercise, or defense of legal claims;
- Vital public interests.

Requests for deletion shall be addressed to:

Email: business@revopro.ai

We shall process deletion requests within one (1) calendar month unless a lawful exception applies, in which case you will be notified accordingly.

10. RIGHTS OF DATA SUBJECTS

As a Data Subject, you are entitled to exercise the following rights under the General Data Protection Regulation (GDPR) and the UAE Data Protection Law:

10.1 Right of Access (Article 15 GDPR; Article 13 UAE Data Law)

You have the right to obtain confirmation from RevoPro AI as to whether or not your Personal Data is being processed, and where that is the case, access to the Personal Data and information regarding:

- The purposes of processing;
- The categories of Personal Data concerned;
- The recipients or categories of recipients to whom the Personal Data has been disclosed;

- The envisaged period for which the Personal Data will be stored;
- Your rights to rectify or erase Personal Data or restrict or object to Processing;
- The existence of automated decision-making, including profiling.

10.2 Right to Rectification (Article 16 GDPR; Article 14 UAE Data Law)

You have the right to request that we correct any inaccurate Personal Data concerning you and, considering the purposes of Processing, complete any incomplete Personal Data.

10.3 Right to Erasure ("Right to be Forgotten") (Article 17 GDPR; Article 8 UAE Data Law)

You have the right to request the erasure of your Personal Data where:

- The Personal Data is no longer necessary for the purposes for which it was collected or otherwise processed;
- You withdraw your consent on which the Processing is based;
- You object to the Processing and there are no overriding legitimate grounds;
- The Personal Data has been unlawfully processed;
- Erasure is required for compliance with a legal obligation.

This right may be subject to exemptions under applicable laws.

10.4 Right to Restriction of Processing (Article 18 GDPR)

You have the right to obtain a restriction on the Processing of your Personal Data where:

- You contest the accuracy of the data;
- The Processing is unlawful and you oppose erasure;
- We no longer need the Personal Data but you require it for the establishment, exercise, or defense of legal claims;

- You have objected to Processing pending verification of whether legitimate grounds override your interests.

10.5 Right to Data Portability (Article 20 GDPR)

Where the Processing is based on consent or contractual necessity and carried out by automated means, you have the right to:

- Receive the Personal Data concerning you in a structured, commonly used, and machine-readable format; and
- Transmit that data to another controller without hindrance.

10.6 Right to Object to Processing (Article 21 GDPR)

You have the right to object, on grounds relating to your particular situation, at any time to the Processing of your Personal Data based on legitimate interests, including profiling based on those interests.

RevoPro AI shall cease Processing unless compelling legitimate grounds override your interests, rights, and freedoms.

You also have the right to object to direct marketing at any time.

10.7 Right to Withdraw Consent (Article 7(3) GDPR; Article 6 UAE Data Law)

Where Processing is based on your consent, you have the right to withdraw your consent at any time without affecting the lawfulness of the Processing carried out prior to withdrawal.

Withdrawal requests may be submitted by contacting:

Email: business@revopro.ai

10.8 Right to Lodge a Complaint

You have the right to lodge a complaint with:

- The **UAE Data Office** (United Arab Emirates) under Federal Decree-Law No. 45 of 2021; or
- A relevant **EU Supervisory Authority** within your habitual residence, place of work, or place of alleged infringement under Article 77 GDPR.

We encourage you to contact us first to resolve any concerns.

10.9 Response Timeframes

RevoPro AI shall endeavor to respond to all verifiable Data Subject Requests within **thirty (30) calendar days** of receipt, subject to the possibility of extension under Article 12(3) GDPR where requests are complex or numerous.

If an extension is necessary, you will be informed within the original thirty-day period.

11. COOKIES AND TRACKING TECHNOLOGIES

RevoPro AI utilizes cookies and similar tracking technologies in accordance with best practices and applicable laws, including the ePrivacy Directive and GDPR Article 6.

We use cookies for the following purposes:

- **Essential Session Management:** To ensure the proper functioning of the Website and to provide secure logins, navigation, and service delivery.
- **Functionality Enhancement:** To remember your preferences and settings for improved user experience.
- **Analytics and Tracking (Future Implementation):** To gather aggregated, anonymized data on website usage and performance metrics (subject to your consent).

Where required by law, we seek your explicit consent prior to deploying non-essential cookies through a cookie banner and consent management platform.

Further details, including cookie types, retention periods, and withdrawal of consent mechanisms, are provided in our separate **Cookie Policy**.

12. AMENDMENTS AND VERSIONING

RevoPro AI reserves the right to update, amend, or revise this Privacy Policy to reflect:

- Changes in applicable laws or regulations,
- Developments in technology,
- Modifications to our business operations or service offerings.

Where material changes are made that affect your rights or obligations, we will:

- Notify you by email using the last address you provided, where feasible; and/or
- Prominently display notices of the changes on our Website prior to their effective date.

Your continued use of the Website and Services after the effective date of any changes shall constitute your acknowledgment and acceptance of the updated Privacy Policy.

The current version of the Privacy Policy is indicated by the "Effective Date" stated at the top of this document.

13. GOVERNING LAW AND DISPUTE RESOLUTION

13.1 Governing Law

This Privacy Policy, and any dispute, claim, or controversy arising out of or in connection with it, including any question regarding its existence, validity, or termination, shall be governed by and construed in accordance with:

- The **laws of the United Arab Emirates** ("UAE"), including but not limited to the Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data; and

- Where applicable, supplemented by the **General Data Protection Regulation (EU) 2016/679** ("GDPR") with respect to cross-border data processing obligations, international data transfers, and the protection of rights and freedoms of Data Subjects located within the European Economic Area (EEA).

To the extent there is a conflict between UAE Data Protection Law and GDPR obligations, the higher standard of protection for the Data Subject shall apply, unless prohibited by UAE mandatory law.

13.2 Dispute Resolution and Jurisdiction

Any disputes, controversies, or claims arising from or relating to the interpretation, application, performance, or breach of this Privacy Policy shall be submitted to the **exclusive jurisdiction of the competent courts of the Emirate of Dubai**, United Arab Emirates.

The Parties expressly waive any objection to venue and personal jurisdiction, including objections based on forum non conveniens or similar doctrines.

RevoPro AI encourages amicable resolution of any disputes and invites Data Subjects to first contact us directly to attempt informal resolution before initiating any formal legal proceedings.

14. NOTICE OF POLICY CHANGES AND CLIENT COMMUNICATION

14.1 Email Delivery of Notices

RevoPro AI shall communicate all material updates to this Privacy Policy, planned or unplanned service outages, disruptions, or operational changes by email to the Data Subject's or Client's most recently registered contact address.

14.2 Legal Effect of Electronic Dispatch

Such email notifications shall be deemed legally delivered and effective upon successful

dispatch, regardless of whether the recipient confirms receipt. It is the Client's or User's responsibility to ensure that a current and functional email address is maintained on file.

14.3 Deemed Acknowledgment by Continued Use

Continued access to or use of the Website or Services following such notification shall constitute acknowledgment and acceptance of the notified changes or events, subject to applicable data protection law and without prejudice to any rights of objection or withdrawal under Articles 7(3), 13–21 of the GDPR or Articles 6–10 of the UAE Data Protection Law.

15. CONTACT INFORMATION

Should you have any inquiries, concerns, complaints, or wish to exercise your rights under this Privacy Policy, you may contact our Data Protection Officer ("DPO") at the details provided below:

Data Protection Officer (DPO)

Company: RevoPro AI Artificial Intelligence Developing Services

Email: business@revopro.ai

Postal Address:

Al Khawaneej 1, Area 281, Street 115,
Villa 3, PO Box: 79622,
Dubai, United Arab Emirates

We encourage you to clearly identify the nature of your inquiry (e.g., access request, complaint, withdrawal of consent) to facilitate prompt and effective handling.