

Version as of January 27, 2026

## 1. Introduction

URBI Gulf FZ-LLC (“URBI”, “Company”, “We”) is committed to ensuring the lawful, fair, and transparent processing of personal data in the course of its business activities.

This Privacy Policy explains how URBI collects, processes, stores, protects, and transfers personal data in accordance with:

- UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (PDPL);
- Cabinet Decision No. 6 of 2022 (Executive Regulations of PDPL);
- UAE Federal Decree-Law No. 34 of 2021 (Cybercrime Law);
- UAE Federal Decree-Law No. 20 of 2018 (AML/CFT Law), where applicable;
- TDRA regulations, where applicable;
- ISO 27701, ISO 27001, ISO 27018, ISO 29100 standards;
- internationally recognised data protection principles reflected in the GDPR.

## 2. Scope of this Policy

This Policy applies to any personal data processed by URBI in the course of providing, operating, supporting, and developing its products, platforms, services, geospatial solutions, analytics tools, and all related business activities.

It covers personal data processed through URBI’s websites, platforms, applications, mapping and geospatial systems, analytical environments, communication channels, contractual relationships, and any other technical or organizational means used by the Company.

This Policy applies regardless of the form in which personal data is processed, including automated and non-automated processing, and irrespective of whether such data is collected directly from the data subject, generated through the use of URBI systems, or obtained from lawful third-party sources.

The Policy also applies to personal data processed by URBI’s employees, contractors, consultants, partners, and service providers acting on behalf of URBI, as well as to data processed within cloud, hosting, and third-party technical environments used for the delivery of URBI services.

This Policy applies to all categories of data subjects whose personal data may be processed by URBI in the course of its business activities.

## 3. Lawful Basis for Processing Personal Data

URBI processes personal data strictly on one or more of the lawful bases provided under PDPL:

- performance of a contract;
- compliance with legal obligations;
- legitimate business interests;
- consent of the data subject;
- protection of vital or public interests where applicable.

## 4. Types of Personal Data We May Process

Depending on the interaction with URBI systems and platforms, personal data may include:

- identification data (name, email, phone, company details);



- technical data (IP address, device data, browser data);
- geolocation and mapping-related data;
- usage data of URBI platforms;
- communication records;
- KYC/verification data where legally required.

URBI does **NOT** intentionally collect sensitive personal data unless required by law.

## **5. Purposes of Processing**

Personal data is processed solely for legitimate, specific, and justified business purposes related to the provision, operation, support, and development of URBI platforms, products, and services, user authentication and account management, performance of contractual obligations, ensuring information and cyber security, fraud prevention, compliance with applicable legal and regulatory requirements, conducting analytics to improve service quality, and maintaining communication with users, customers, and partners.

## **6. Automated Processing and Profiling**

URBI systems may process data using automated technologies, analytics, and geospatial intelligence tools. Such processing is used solely for:

- system functionality;
- analytics;
- service optimization;
- security monitoring.

URBI does not make automated decisions producing legal effects without human oversight.

## **7. Data Protection Officer and Governance**

URBI has designated a responsible data protection and compliance function overseeing:

- compliance with PDPL;
- data protection impact assessments (DPIA);
- monitoring of data processing risks;
- handling data subject requests.

## **8. Data Subject Rights**

In accordance with PDPL, individuals have the right to:

- access their personal data;
- request rectification;
- request erasure where applicable;
- restrict or object to processing;
- request data portability;
- withdraw consent where processing is based on consent;
- object to automated processing where applicable.

Requests may be sent to: [info@urbi.ae](mailto:info@urbi.ae)

## 9. Data Retention

URBI retains personal data only for as long as necessary to fulfil the purposes for which the data was collected, including the provision of services, performance of contractual obligations, and compliance with legal, regulatory, and operational requirements.

Retention periods are determined based on:

- the nature and purpose of the processing;
- contractual obligations;
- applicable regulatory requirements (including PDPL, TDRA regulations, AML requirements, and other applicable UAE laws);
- the necessity to protect URBI's legal rights and interests.

Once personal data is no longer required for these purposes, it is securely deleted, anonymized, or archived in accordance with internal data retention and information security procedures.

## 10. Data Security Measures

URBI implements organisational and technical measures in line with ISO 27001/27701/27018, including:

- encryption;
- access control;
- logging and monitoring;
- pseudonymisation where appropriate;
- physical and logical security controls;
- regular security assessments.

While URBI implements robust technical and organisational security measures in accordance with ISO standards, users should be aware that data transmitted over the Internet is inherently subject to certain security risks.

Users are responsible for maintaining the confidentiality of their account credentials, including usernames and passwords. URBI will never request users to disclose their passwords except where necessary for secure authentication within URBI platforms.

URBI cannot guarantee absolute security of data transmitted over public networks but applies all reasonable measures to protect personal data both in transit and at rest.

## 11. Data Breach and Cybersecurity

In case of a data breach, URBI follows internal incident response procedures in compliance with PDPL and UAE Cybercrime Law.

## 12. Sharing and Disclosure of Data

Personal data may be shared only:

- where required for service provision;
- with authorised service providers under strict safeguards;
- where required by UAE law or regulators;
- where necessary to protect legitimate interests.

URBI does not sell personal data.

URBI ensures that any sharing or disclosure of personal data is limited strictly to what is necessary for the specified purpose, is supported by appropriate legal safeguards, and does not result in processing incompatible with the original purpose of collection.

### **13. Cross-Border Data Transfers**

Where data is transferred outside the UAE, URBI ensures adequate safeguards in accordance with PDPL and Cabinet Decision No. 6 of 2022, including contractual protections and adequacy assessments.

### **14. Compliance with TDRA and AML Requirements**

Where applicable, URBI processes certain categories of technical, geolocation, device, network, and identification data in strict compliance with:

- regulations and guidance issued by the Telecommunications and Digital Government Regulatory Authority (TDRA);
- UAE Federal Decree-Law No. 20 of 2018 on Anti-Money Laundering and Counter-Terrorism Financing;
- applicable cybersecurity and data protection regulations.

URBI ensures that such data is processed only for lawful, legitimate, and regulatory-compliant purposes and is retained only for the period required by applicable laws and regulatory authorities.

### **15. Cookies and Technical Data**

Cookies are small text files that are stored on a user's device when visiting a website or using a platform. They allow the platform to recognize the device, remember user preferences, and improve the functionality and security of the service.

URBI platforms may use cookies and similar technologies (such as device identifiers, session tokens, and analytics scripts) for the following purposes:

- session management;
- security;
- analytics;
- improving user experience.

Users may control or disable cookies through their browser settings; however, doing so may affect the functionality of certain URBI platform features.

### **16. Contact and Complaints**

For any questions or requests regarding personal data, please contact:

[info@urbi.ae](mailto:info@urbi.ae)

### **17. Amendment of Privacy Policy**

URBI may make changes to this Privacy Policy to accommodate updates in legal and regulatory requirements, business needs related to upgrading technologies and applications, or for service improvement.

URBI reserves the right to make material or minor modifications to the content of this document at any time and without prior notice.

Continued use of URBI websites, platforms, or services constitutes acceptance of such changes.

Users are encouraged to review this Policy periodically.

In case of material changes to this Policy, URBI will provide notice via email or by means of a notice on its website.