

Terms of Use

Free From Borders Document Clearing Services L.L.C

Effective Date: 04/01/2024 **Last Updated:** 06/08/2025

These Terms of Use ("Terms") govern your access to and use of the website, platform, communications, and services provided by **Free From Borders Document Clearing Services L.L.C** ("we," "our," "us").

By accessing our website or communicating with us in any form, you agree to be bound by these Terms. If you do not agree, you must not use our website or services.

1. Scope of Service

Free From Borders offers advisory services related to citizenship and residency by investment. All services are subject to eligibility criteria set by third-party governments and subject to change without notice.

We do **not guarantee approval** or outcomes for any application, and we are not liable for decisions made by governmental authorities.

2. Eligibility to Use

You must be at least 18 years old and have the legal capacity to enter into contracts to use our services.

3. Communication Policy

By submitting your details via our website, forms, or chat channels, you agree to be contacted via:

• SMS (A2P-compliant messaging via Twilio)



- WhatsApp
- Phone Calls (manual or Al-assisted)
- Email

You may opt out of promotional communication at any time via the instructions provided in each message.

4. Intellectual Property

All content on our website, including text, images, logos, software, and visual design, is the property of Free From Borders or its licensors and is protected under intellectual property law. You may not copy, reproduce, or use any content without written consent.

5. Limitation of Liability

To the maximum extent permitted by law, Free From Borders is not liable for:

- Any direct, indirect, or incidental loss arising from the use of our website or services
- Delays, disruptions, or technical issues
- Government rejections, policy changes, or processing delays
- Misuse of your account or data by third parties outside of our control

6. Third-Party Links

Our website may contain links to third-party websites or content. We are not responsible for the privacy practices or accuracy of such content and disclaim any liability arising from your use of them.



7. Termination

We reserve the right to suspend or terminate access to our services if you:

- Provide false or misleading information
- Misuse our platform or brand
- Violate any terms outlined in this agreement

8. Governing Law

These Terms are governed by the laws of the **United Arab Emirates**, without regard to conflicts of law principles. Any disputes shall be resolved in the courts of DIFC Dubai, UAE.

9. Changes to Terms

We may update these Terms from time to time. Your continued use of the website or services after any updates constitutes acceptance of those changes.

10. Contact

For questions regarding these Terms or our services:

Free From Borders Document Clearing Services L.L.C Dubai, United Arab Emirates support@freefromborders.com www.freefromborders.com



Privacy Policy

Free From Borders Document Clearing Services L.L.C

Effective Date: 04/01/2024 **Last Updated:** 06/08/2025

Free From Borders ("we", "our", or "us") respects your privacy and is committed to protecting your personal information. This Privacy Policy describes how we collect, use, disclose, and safeguard your data when you visit our website or engage with our services, including via SMS, WhatsApp, phone calls, email, or any other digital channel.

This policy is in accordance with applicable data protection laws, including the EU General Data Protection Regulation (GDPR), California Consumer Privacy Act (CCPA), and United Arab Emirates data protection frameworks, where applicable.

1. Information We Collect

We collect both personal and non-personal information directly from you and through third-party tools to ensure delivery of our services. This may include:

A. Personal Data

- Full Name
- Email Address
- Phone Number (including WhatsApp/SMS)

B. Automatically Collected Data

- IP Address
- Device Type, Operating System, and Browser Type
- Referring URL and Clickstream Data
- · Cookies and Tracking Pixels
- Interaction History on Website, Emails, SMS, and WhatsApp

2. Purpose of Data Collection



We use your data to:

- Deliver citizenship and residency by investment services
- Determine program eligibility and prepare application documents
- Communicate with you via SMS, WhatsApp, calls, or email
- Fulfill regulatory and due diligence obligations
- Optimize website performance and marketing efficiency
- Comply with legal requirements in relevant jurisdictions

3. SMS & Communication Consent (A2P 10DLC)

By providing your phone number, you consent to receive automated and manual SMS messages from Free From Borders. These messages may include:

- Appointment confirmations and reminders
- Application updates or documentation requests
- Pricing or program changes
- Promotional or educational information

Opt-Out:

You may opt out of SMS at any time by replying **STOP** to any message. For assistance, reply **HELP** or contact us at: **support@freefromborders.com**.

Note: Standard message and data rates may apply depending on your carrier.

4. Data Storage and Third-Party Services

We utilize secure third-party platforms to store and process your data, including:

- Twilio (for SMS and voice communication)
- **Typeform** (data intake forms)
- Pipedrive CRM
- Zapier (automation)



- Google Workspace (email and document storage)
- Stripe / Xero (payment and invoicing)

All platforms are compliant with industry-standard encryption protocols. We require all third-party providers to meet GDPR-equivalent standards.

5. Data Retention

We retain personal information only for as long as required to:

- Fulfill the purposes outlined in this Policy
- Satisfy legal, regulatory, or audit requirements
- Support application tracking or client follow-up

Data is securely deleted or anonymized when no longer necessary.

6. Cookies & Tracking Technologies

We use cookies, analytics tools, and tracking pixels for the following:

- Website analytics (Google Analytics, Meta Pixel)
- Behavioral retargeting and advertising
- A/B testing of site content and features
- Personalization of website experience

You may manage cookie preferences in your browser or reject tracking through opt-out links where available.

7. Your Rights

Depending on your jurisdiction, you have the right to:

- Request access to your personal information
- Correct inaccurate or outdated information



- · Request deletion of your data
- · Restrict or object to processing
- Lodge a complaint with your local authority

To exercise these rights, email: support@freefromborders.com

8. International Transfers

Your data may be transferred across international borders, including to jurisdictions without equivalent data protection laws. In such cases, we implement appropriate safeguards such as Standard Contractual Clauses (SCCs) or other recognized mechanisms.

9. Security Measures

We take all reasonable steps to protect your personal data, including:

- End-to-end encryption for data in transit
- Role-based access control
- Regular audits and risk assessments
- Compliance with international data handling standards

10. Policy Updates

We reserve the right to amend this policy. The most recent version will always be available at: www.freefromborders.com/privacy-policy

11. Contact Information

Free From Borders Document Clearing Services L.L.C Dubai, United Arab Emirates support@freefromborders.com www.freefromborders.com