

PRIVACY POLICY

Atelier Digital.AI Ltd

Dubai AI Campus, Level 3, DIFC Innovation One

Version 3.0

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1. Introduction

This Privacy Policy describes how the company AtelierDigital.ai Ltd (“**Atelier Digital**,” “we,” “our,” or “us”) collects and processes data which identify individuals (“Personal Data”, “Personally Identifiable Information” “PII”) who are customers and other users of our services (“Users”, “you”), and your associated rights.

This Privacy Policy (“**Policy**”) explains how we collect, use, store, share, and protect your personal data when you visit our website <https://www.atelierdigital.ai> or use our Virtual Try-On platform and related services (together, the “Service”). Your privacy is extremely important to us, and we are committed to offering you a safe and hassle-free experience while visiting our websites and using our services.

This Policy is issued in accordance with Dubai International Financial Centre (“**DIFC**”) Data Protection Law No. 5 of 2020 (the “**Law**”) and aligns with requirements of ISO27701 (“the standard”). This Policy should be read in conjunction with our [User Acceptance policy](#), which governs your use of the website and related services.

By using our Service, you agree to the terms of this Policy.

2. Personal Data We Collect

We collect personal data that you voluntarily provide or that is automatically collected when you use our Service.

Category	Examples	Purpose
Contact Information	Name, email address (optional), phone number (optional)	To communicate, provide support, and respond to enquiries.
Uploaded Images (Selfies)	Photographs uploaded for virtual try-on	To generate visualisation only — <i>not</i> for identification or authentication.
Body Parameters	Gender, height, breast, waist, hip, leg measurements	To simulate garment fit and appearance; these do not uniquely identify you.
Device & Technical Data	IP address, device type, browser version, session data, cookie identifiers	To maintain security, functionality, and performance.
Service Usage Data	Interaction logs, timestamps, feature use, crash reports	To improve functionality and user experience.

We do not intentionally collect special category personal data (e.g., racial or ethnic origin, political opinions, religious beliefs, or health data). Users are advised not to submit such data.

3. How We Use Personal Data

We process your personal data only for legitimate and lawful purposes, including to:

- Provide, operate, and maintain the Service;
- Generate and display your virtual try-on experience;
- Protect against security threats, fraud, or misuse;
- Comply with applicable legal obligations.

We do not use your data for direct marketing or automated decision-making that produces legal or similarly significant effects.

4. Lawful Basis for Processing

Under Article 10 of the DIFC Data Protection Law, we rely on the following lawful bases:

- Contractual necessity: to deliver the virtual try-on and related functionality you request;
- Legitimate interests: to ensure platform integrity, security, and improvement (balanced against your rights);
- Consent: for non-essential cookies or analytics, and if at any point we process biometric data that qualifies as special category data;
- Legal obligation: to comply with DIFC or UAE laws and regulatory requirements.

You may withdraw your consent at any time by contacting us at support@atelierdigital.ai, without affecting prior lawful processing.

5. Uploaded Images and Biometric Considerations

- Uploaded images and body parameters are used only to render temporary visualisation for your virtual try-on session.
- We do not use these data to identify or authenticate you, and we do not create biometric templates or facial recognition data.
- As further detailed in our User Acceptance Policy, users grant Atelier Digital a limited, revocable licence to process uploaded images and content solely for the operation of the virtual try-on feature and compliance with applicable law.

6. Cookies and Analytics

Atelier Digital uses cookies on its websites to optimise user experience, enhance security and combat fraudulent and/or malicious web activity. You can manage your cookie preferences via your browser or our consent banner.

7. Data Sharing and Disclosure

We do not sell or rent personal data. We may share data only with:

- Service providers such as Amazon Web Services (AWS) hosting and infrastructure, analytics or security vendors, all of whom act under our instructions and under written contracts compliant with the Law;
- Professional advisers (lawyers, auditors, insurers) under confidentiality.

- Regulators or law-enforcement authorities, where required by law or legal process.

All third parties are required to protect your data and use it only as instructed by us.

8. International Data Transfers

Your data may be stored or processed on AWS data centres located in Middle East (UAE) or Europe (Frankfurt), depending on the Atelier Digital's clients preferences.

Where data are transferred outside the DIFC, we ensure appropriate safeguards in line with Articles 26–27 of the Law, such as:

- transfers to jurisdictions recognised as adequate by the DIFC Commissioner of Data Protection; or
- standard contractual clauses or other authorised mechanisms.

9. Data Retention

- Images and body parameters:
 - o Virtual mirror / kiosk / temporary device use case:
Images and body measurements generated for the virtual try-on experience are stored only temporarily and are automatically deleted once the try-on session ends. No persistent profile is created on such devices.
 - o Personal device / user profile use case:
Where users access the Service from their own device and choose to create or store a personal profile, images and body measurements may be retained to enable re-use for future sessions. These data are retained only until the user chooses to delete their stored profile or associated inputs.
- Contact details: retained while your account or request is active and up to six (6) months thereafter for support or compliance.
- Technical logs: retained for 30 days for security and diagnostic purposes, then anonymised or deleted.

After retention expiry, we securely delete or irreversibly anonymise personal data.

10. Security Measures

We maintain appropriate technical and organisational measures to protect personal data against unauthorised access, alteration, or loss, including:

- Encryption in transit and at rest;
- Access controls and least-privilege management;
- Network segmentation and monitoring;
- Regular penetration testing and security audits;

Our practices are aligned with ISO 27001 and ISO 27701 standards.

11. Your Rights

Under Articles 32–40 of the Law, you have the right to:

- Access your personal data;
- Rectify inaccurate data;
- Erase data where no lawful basis exists for retention;
- Restrict processing in certain circumstances;
- Object to processing based on legitimate interests; and
- Withdraw consent at any time.

You can exercise these rights by emailing support@atelierdigital.ai. We will respond within one (1) month in accordance with the Law.

12. Data Protection Impact Assessments (DPIAs)

Atelier Digital conducts Data Protection Impact Assessments for high-risk processing activities as required under Article 20 of the Law.

13. Personal Data Breach Notification

If a data breach occurs that compromises the confidentiality, integrity, or availability of personal data, we will:

- Notify the DIFC Commissioner of Data Protection; and
- Inform affected individuals as soon as practicable after becoming aware of the breach.

14. Children's Privacy

Our Service is not intended for children under 13 years of age. We do not knowingly collect data from children. If you believe a child has provided personal data, please contact us for prompt deletion.

15. Third-Party Links

Our website may include links to third-party websites or applications. Clicking on those links may allow third parties to collect or share your data. We do not control these third-party websites and applications and are not responsible for their privacy notices. We encourage you to read the privacy notices of third-party sites that you visit.

16. Contact Information and complaints

For any questions, requests, clarifications or complaints about the processing of your personal data, please contact AtelierDigital.ai Privacy Office:

- Email: support@atelierdigital.ai
- Address: Level 3, Innovation Hub, Dubai International Financial Centre, United Arab Emirates.

17. Updates to This Policy

The Privacy Policy is maintained, continually improved, and updated when necessary. Any significant or material changes will be notified via our website or by email (where appropriate).

The most recent version will always be available at: <https://www.atelierdigital.ai/docs/privacy-policy>.

The “Effective Date” above reflects the latest revision.

18. Governing Law and Jurisdiction

This Policy is governed by the laws of the Dubai International Financial Centre (DIFC). Any dispute arising out of or relating to this Policy shall be subject to the exclusive jurisdiction of the DIFC Courts.