



## Privacy and Information Confidentiality Policy

We at **CIT Limited** (the “Company”) appreciate your interest and concern over your data privacy on **Iungo** (the “App”).

This policy has been developed to support relevant users in understanding the nature of the data that the Company collects when they register through the App and use the App, and how we handle such data.

Given the importance of data and its confidentiality, and due to the Company’s efforts to provide the best level of services, the Company is committed to maintaining the privacy and confidentiality of users’ data and any other data entered by users. Such data may only be disclosed in accordance with approved law. The most important applied measure across the Company is to protect users' personal information, including:

- Strict procedures to protect the information and technology used to prevent fraud and unauthorized access to our systems.
- Regular update of procedures and controls that meet or exceed standard criteria.
- The Company employees are highly trained and qualified to respect and protect the privacy and confidentiality of the App users' personal information.
- The Company collects data, as per its statutes and authority, to the minimum limit required to fulfil the purposes of providing app services.

### Information we collect

The right to view users' data and information shall be limited to the Company’s authorized employees and for the purposes and uses defined by the Company’s statutes.

We may collect information about you when you use the App, including:

- Device information: We may collect information about the device you are using, such as the model, operating system, and mobile network information.
- Usage information: We may collect information about how you use the App, such as the features you use, the content you view, and the actions you take.
- Location information: We may collect information about your geographical location if you enable location services on your device and use the App.
- Personal information: We may collect personal information used during account registration, such as your name, mobile number, and email address, if you choose to provide it to us.
- Other information submitted by the user, such as Service Requests, Service Ratings, and Customer Feedback.

## How we use your information

We may use the information we collect about you to:

- Provide and improve the App: We use the information to operate and improve the App, including to develop new features and services.
- Personalize your experience: We may use the information to personalize your experience with the App, such as by recommending content or features that may be of interest to you.
- Communicate with you: We may use the information to communicate with you about the App, such as to send you updates or respond to your inquiries.
- Advertising and analytics: We may use the information to serve personalized advertising and to analyze how users interact with the App.
- Service Rating and Feedback: To enable you, at your option, to participate in interactive features of our services, rate our services, and provide your feedback.
- Legal bases: For data processing in accordance with the Personal Data Protection Law in the Kingdom of Saudi Arabia and the General Data Protection Regulation (GDPR).

By submitting your data and personal information through the App, you completely agree that we store, process and use such data. We reserve the right at all times to disclose any information to the competent entities, as necessary, to comply with the law in the Kingdom of Saudi Arabia.

## Data Protection Rights

You have the following data protection rights:

- The right to access or update the information we have about you at any time: You have the right to access and update your information directly through your account settings section, or you can request deletion of your personal information by contacting us.
- Right to rectification: You have the right to correct your information if the information is inaccurate or incomplete.
- Right to object: You have the right to object to our processing of your personal information.
- Right to restriction: You have the right to request that we restrict processing of your personal information.
- Right to data portability: You have the right to be provided with a copy of the information we hold about you in a structured, machine-readable, and commonly used format.
- Right to withdraw consent: You have the right, at any time, to withdraw your consent on which we relied and processed your personal information.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

We may ask you to verify your identity before responding to any such requests.

## **Retention of information**

We retain your personal information only for as long as it is necessary for the purposes set out in the Privacy Policy, to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), to resolve disputes, and to enforce our legal agreements and policies.

We retain usage data for internal analytical and actionable purposes.

In general, usage data is kept for a shorter period, except where the data is used to strengthen security and improve the functionality of our services and/or the App, or where we are legally obligated to keep such data for a longer period.

## **Data Transformation**

Your information, including Personal Information, may be transferred and stored on computers located outside of your geographical area or other governmental jurisdiction where data protection laws differ from those of your jurisdiction.

Your acceptance of this privacy policy and your provision of information accordingly constitute your consent to transfer your data to any other country in which any of our subsidiaries and/or affiliates are located.

We take all necessary measures to ensure that your data is treated securely and in accordance with this Privacy Policy as well as GDPR, and that your personal data will not be transferred to any organization or country unless adequate controls are in place, including the security of your data and other personal information.

## **Disclosure in application of the provisions of the law:**

In certain circumstances, we may be required to disclose your personal information if required by law or to respond to requests from applicable Government authorities (e.g., a court or a government agency).

We may disclose your personal information in good faith if such action is necessary to:

- Enforce legal obligations.
- To protect and defend the rights of the Company and/or any of its subsidiaries and/or affiliate companies or any of its properties.
- To limit any wrongdoing related to the App.
- To protect the personal security of the App users.
- To protect against legal liability.

## **Data Security**

The security of your data is important to us, and we take reasonable measures to protect your information from unauthorized access, use, or disclosure. However, it must be remembered that transmission over the Internet and electronic storage methods are not 100% secure, so we cannot guarantee their absolute security.

While we strive to use commercially acceptable means to protect your personal information, we do not guarantee that it is absolutely secure, as some events may occur outside our control and are not related to intentional behaviour and/or willful negligence on our part.

## **General Provisions**

The Company reserves its right to carry out any minor or significant modifications to the policy from time to time, without any need for notification. Such modifications shall be valid from the time of publishing the same on the App. Your continued use of our App following such modifications shall be deemed an agreement to such modifications. Therefore, you shall regularly review the policy to make sure you are informed of its most recent version.

Laws of the Kingdom of Saudi Arabia shall be the sole applicable laws in any conflict that might arise from using the App. Courts of Saudi Arabia shall have the sole jurisdiction over such conflicts.

## **Contact Us**

Please contact us if you have any questions related to this privacy policy by email at [support@citgrouppltd.com](mailto:support@citgrouppltd.com).