

Daos Hub
Privacy Policy

Date of entry into force:
01 november 2024

Introduction

Please read this Privacy Policy carefully before accessing and using the Telegram bot with its Telegram username being @Daoshub_bot (hereinafter the "Bot").

This Privacy Policy (hereinafter "Privacy Policy") constitutes an agreement between PERFECT PHYGITAL EVENTS L.L.C, a company registered in accordance with the laws of the UAE, license no. 1404535 (hereinafter "Perfect Phygital", "We", "Us" and "Our"), and a capable natural person (hereinafter "User", "You", or "Your") who uses the Bot according to the Terms and Conditions, concerning Your Personal Data Processing.

You agree that by using the Bot, You have read, understood, and agreed to be bound by the provisions specified in this Privacy Policy.

If You do not agree with this Privacy Policy, You are expressly PROHIBITED from accessing and using the Bot.

This Privacy Policy is an integral part of the Terms and Conditions.

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The main part

I. Terminology

- **Telegram.** Telegram Messenger Inc., as the provider of the Telegram platform on which the Bot operates.
- **Services.** The various utility features and interactions accessible through the Bot and any other capabilities made available to Data Subjects via the Bot. These Services are provided by Perfect Phygital and are independent of Telegram's messaging platform.
- **Consent.** A clear positive statement or action which indicates in a specific and unambiguous manner that the Data Subject authorizes the Controller to Process their Personal Data.
- **Controller.** An establishment or natural person that has Personal Data, and by virtue of its activity, determines, whether individually or jointly with other persons or establishments, the method and criteria for Processing such Personal Data and the purpose of Processing it.
- **Co-Controller.** An establishment or natural person who determines the purposes and means of Processing with the Controller.
- **Data Protection Authority.** A government agency that protects data subjects from unlawful processing in Your country. The UAE Data Office acts as the UAE Data Protection Authority.
- **Data Subject.** A natural person whose Personal Data is processed by the Controller when using the Bot.
- **Personal Data.** Any data related to a specific natural person or related to a natural person that can be identified directly or indirectly by linking the data, through the use of identification elements such as their name, voice, image, identification number, their electronic identifier, their geographical location, or by one or more physical, physiological, economic, cultural or social characteristics.
- **Data Breach.** A breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access to Personal Data.
- **Processing.** Any operation or set of operations performed on Personal Data using any electronic means. This includes collecting, storing, recording, organizing, adapting, modifying, circulating, altering, retrieving, exchanging, sharing, using, characterizing and disclosing Personal Data by broadcasting, transmitting, distributing, making available, coordinating, merging, restricting, blocking, erasing or destroying it or creating forms thereof.
- **Automated Processing.** Processing carried out using an electronic program or system that operates in an automated and automatic manner, either independently without any human intervention or partially independently with limited human supervision and intervention.
- **Processor.** An establishment or natural person that processes Personal Data on behalf of the Controller.

- **Third Party.** Any person other than the Data Subject, the Controller or Processor and the Data Protection Authority to which the Controller or Processor transfers Personal Data.

II. Information about the Controller

The Controller for the purposes of Processing Personal Data on the Bot is Perfect Phygital.

III. Personal Data being Processed

Perfect Phygital is Processing certain Personal Data about You when You are using the Bot to provide and improve its Services. This data may include:

- **Public Account Data:** When You use the Bot, Perfect Phygital may receive Your public Telegram account data, including:
 - o Screen name.
 - o Username.
 - o Profile picture(s).
- **Telegram ID and Email:** The Bot collects Your unique Telegram ID and, if provided the Bot may collect, Your email for account-related communication and authentication.
- **Interaction Data:** Depending on how You interact with the Bot, additional data may be collected:
 - o **Messages:** Any message You send to the Bot.
 - o **Links and Buttons:** If You click on links or buttons provided by the Bot, Your IP address may be collected if the Bot controls the linked website.
 - o **Group Membership:** If the Bot is added to a group where You are a member, it may know You are a group participant. Bots in groups can operate in two modes:
 - i. With access to messages: In this mode, the Bot can see messages in the group.
 - ii. Without access to messages: The Bot will not access group messages in this mode. The Telegram interface indicates whether or not the Bot has access to group messages.
- **Inline Queries:** If You use an inline bot feature (e.g., @BotName), any query typed will be sent to the Bot to provide its Services. The first-time usage of this feature will be indicated.
- **Language Settings:** To support localization, the Bot may receive information about Your interface language based on Your app or operating system settings. Updates to language settings may not immediately reflect in interactions with the Bot.
- **Connection to Dubai or the UAE:** The Bot may collect information regarding Your connection to Dubai or the UAE. This may include:
 - o Whether You live in the UAE.
 - o If You are visiting the UAE.
 - o Plans to relocate to the UAE.

IV. Sources of Personal Data collection

Directly from You: The primary source of data collection is the information You provide directly to the Bot. This includes:

- **Messages sent to the Bot:** Any text, files, or personal information (such as contact or phone number) shared directly through messaging.
- **Responses to Questionnaire Fields:** The Bot will collect information You enter into specific internal fields in its questionnaire.
- **Inline Bot Usage:** Data from queries made using inline bot commands (e.g., @BotName), where Your inputs are processed to provide relevant Services.

Automatically when using the Bot: We automatically collect Public Account Data and Interactions Data when You use the Bot.

Other sources: In some cases, We may receive Personal Data of Data Subjects from Third Parties.

V. Processing of Personal Data basis

Perfect Phygital is Processing Personal Data on the following legal bases:

- **Consent:** By using the Bot and voluntarily providing information through interactions and questionnaire responses, You give Consent to the Processing of Your Personal Data for the specific purposes outlined in this Privacy Policy. This includes Personal Data collected directly from You and automatically through device interactions.
- **Contractual Obligations:** Processing is necessary to provide our Services, including administering rewards programs, giveaways, and promotional activities, such as awarding points for completing tasks (e.g., reposting, following accounts, inviting friends, activating features) and tracking progress towards earning entries or rewards. This processing is essential to meet Our obligations for any incentive programs You choose to participate in through the Bot.
- **Legal obligations:** In some cases, Perfect Phygital may be required to process Personal Data to comply with legal obligations, such as responding to lawful requests from authorities or fulfilling regulatory requirements.
- **Legitimate interest:** The Processing is necessary for the legitimate interests of the Perfect Phygital, provided that these interests do not override the rights and interests of the Data Subject.

We use Your Personal Data to operate the Bot and provide Services properly.

VI. Processors and Co-Controllers

Processors. Perfect Phygital may engage third-party companies as Processors of Your Personal Data. These Processors provide services such as hosting, payment processing, technical support, analytics and other operations necessary for the operation of the Bot and the provision of the Services.

Co-Controllers. In some cases, Perfect Phygital may work with organisations or companies that jointly determine the purposes and means of Processing Personal Data with Us. In such cases, we act as a Co-Controller with these organisations.

Cross-border data transfers. Perfect Phygital may transfer Personal Data outside the UAE to countries with adequate data protection laws or under agreements requiring compliance with UAE protection standards. Transfers may also occur with the Data Subject's consent or when necessary for contractual or legal obligations.

Ensuring data protection. Perfect Phygital takes all necessary technical and organisational measures to ensure the safety of Personal Data transferred to Processors or Co-Controllers.

We regularly conduct security assessments and monitor compliance with data protection policies.

List of Processors. The following Processors may Process Personal Data:

Processor	Purpose of use	Location	Data protection
Telegram Messenger Inc. (“Telegram”)	To provide the platform on which the Bot operates.	British Virgin Islands	<u>Telegram Privacy Policy</u>

Perfect Phyigital reserves the right to transfer the Personal Data of the Data Subject to other Processors when necessary to operate the Bot and provide Services properly.

List of Co-Controllers. The following Co-Controllers may determine the purposes and means of Processing Personal Data with Us:

Co-Controller	Purpose of use	Location	Data protection
DAOS BUSINESS CENTER L.L.C	To manage and communicate results of giveaways, including identifying and notifying winners, verifying eligibility, and distributing rewards	UAE	Data sharing agreements, restricted access, encrypted data transfer.

Perfect Phyigital reserves the right to transfer the Personal Data of the Data Subject to other Co-Controllers when necessary to operate the Bot and provide Services properly.

VII. Advertising and marketing

Consent to receive marketing materials. Perfect Phyigital may send You marketing communications, promotional materials and information about Our Services only if we have Your Consent. You have the right to grant or withdraw Your Consent to receive such materials at any time.

Right to Object. You have the right to withdraw from receiving marketing communications at any time by contacting Us using the contact details provided in section XIV. Contact Information of this Privacy Policy. Withdrawal of Your Consent to receive marketing communications does not affect the Processing of Personal Data that was carried out prior to the withdrawal of Consent.

Marketing Platforms. Perfect Phyigital may partner with Third Parties doing business as marketing platforms, such as social media or advertising networks, to deliver targeted advertising to You. These platforms may collect and use Your Personal Data in accordance with their privacy policies.

VIII. Processing time of Personal Data

Perfect Phyigital retains Personal Data only for the period necessary to fulfil the purposes for which it was collected or as required by applicable law, unless You withdraw Your Consent or exercise Your right to object to Processing as provided in section XI. Data Subject’s rights enforcement. Upon expiry of this period, the data will be deleted or anonymised unless otherwise required by law.

Personal Data shall be Processed in a form that allows for the identification of Data Subject for no longer than is necessary for the legitimate purposes for which such Personal Data was collected or is being Processed.

IX. Transfer of Personal Data

General rules. Perfect Phygitel may transfer Your Personal Data to Processors, Co-Controllers and Third Parties on a lawful basis, by court order or by decision of another governmental authority.

Cross-border data transfers. Perfect Phygitel may transfer Personal Data outside of the UAE in the following cases:

- To states or provinces that have legislation addressing Personal Data protection. This includes the most significant provisions, measures, controls, stipulations and rules related to the protection of the privacy and confidentiality of the Data Subject's Personal Data and their ability to exercise their legal rights, as well as having a judicial or regulatory authority imposing appropriate measures against the Controller or the Processor.
- To states or provinces to which the Personal Data is transferred have a bilateral or multilateral agreement related to the protection of Personal Data concluded with the UAE.

Ensuring security. Perfect Phygitel takes all necessary technical and organisational measures to ensure the protection of Personal Data during its transmission, including data encryption, use of secure communication channels and compliance with confidentiality requirements.

X. Data Subject's rights

Right to Receive Information. The Data Subject has the right, by submitting a request to the Controller without any consideration, to obtain the following information:

- **Types of Personal Data:** The types of Your Personal Data being Processed.
- **Purposes of Processing:** The purposes for which Your Personal Data is Processed.
- **Automated Decisions:** Information about any decisions made based on Automated Processing, including profiling, as well as the significance and envisaged consequences of such Processing for You.
- **Data Sharing:** The sectors or establishments with whom Your Personal Data will be shared, both inside and outside the UAE.
- **Data Storage:** The controls and standards governing the storage and retention periods of Your Personal Data.
- **Procedures for Data Correction and Erasure:** Information on how You can request correction, erasure, restriction of Processing, or objection to Your Personal Data.
- **Cross-Border Data Protection:** Protection measures for cross-border Processing in accordance with Articles (22) and (23) of the Federal Decree by Law Concerning the Protection of Personal Data.
- **Breach Actions:** Actions to be taken in the event of a breach or misuse of Your Personal Data, especially if there is a direct and serious threat to the privacy and confidentiality of Your Personal Data.
- **Complaint Submission:** How to submit complaints to the Data Protection Authority.
- **Sources of Personal Data collection.** Where Personal Data is not collected from You, any available information as to the source.

Right to request transfer of Personal Data. The Data Subject has the right to receive their Personal Data, which has been provided to the Controller for Processing, in an orderly and machine-readable format, whenever Processing is based on the Data Subject's Consent, or it is necessary for the implementation of a contractual obligation and is carried out by automated means. The Data Subject has the right to request the transfer of their Personal Data to another Controller whenever it is technically feasible.

Right to Rectification. The Data Subject has the right to request the correction of inaccurate or incomplete Personal Data held by the Controller.

Right to Erasure ("right to be forgotten"). The Data Subject has the right to request the deletion of Personal Data in the following cases:

- The Personal Data is no longer necessary for the purposes for which it was collected.
- The Data Subject withdraws their Consent, and there is no other legal ground for Processing.
- The Data Subject objects to the Processing, and there are no legitimate grounds for continuing the Processing.
- The Personal Data is being Processed unlawfully, and the deletion is necessary to comply with the applicable legislation.

Right to Restrict Processing. The Data Subject has the right to restrict the Processing of their Personal Data in the following situations:

- When the Data Subject contests the accuracy of the Personal Data, allowing time for the Controller to verify its accuracy.
- When the Processing is unlawful, but the Data Subject opposes erasure and requests restriction instead.
- When the Controller no longer needs the Personal Data for Processing, but the Data Subject requires it to establish, exercise, or defend legal claims.

Right to Object to Processing. The Data Subject has the right to object to the Processing of their Personal Data in the following cases:

- If the Processing is intended for direct marketing purposes, including profiling related to direct marketing.
- If the Processing is for conducting statistical surveys, unless it serves the public interest.
- If the Processing violates the principles of Personal Data Processing Controls.

Right to Ask a Question and/or Make a Claim on Data Processing. You are allowed to ask us any questions regarding Personal Data Processing.

Right to Prevent Automated Decision-Making. The Data Subject has the right to object to any decision based solely on Automated Processing, including profiling, that significantly affects them unless:

- Automated Processing is necessary for a contract between the Data Subject and the Controller.
- The Data Subject has given explicit Consent.
- Automated Processing is required by other applicable laws.

XI. Data Subject's rights enforcement

Procedure. You can enforce Your rights regarding Your Personal Data by submitting a request using the contact details provided in section XIV. Contact Information.

Types of Requests. Using the Data Subject Request Form, You can make requests related to any rights provided in section X. Your rights.

Response Time. Upon receipt of Your request, We will acknowledge it and respond within 30 calendar days. In some cases, mainly if Your request is complex, We may extend this period by up to 60 calendar days. If an extension is necessary, We will notify You of the reason and the expected timeframe within the first 30 calendar days.

Costs. You can exercise Your rights free of charge. However, if Your request is manifestly unfounded or excessive, mainly due to its repetitive nature, or requires the payment of any fee, We may charge a reasonable fee or refuse to act on the request.

Identity Verification. To protect Your Personal Data, We may ask for additional information to verify Your identity before answering Your request. This is to ensure that Your Personal Data is not disclosed to unauthorized parties.

XII. Protection of Personal Data

Technical security measures. Perfect Phygital implements robust security measures to protect the integrity and confidentiality of all data it processes through the Bot. User information is handled, transferred, and stored in compliance with applicable data protection laws, with all necessary precautions taken to prevent unauthorized access, modification, deletion, or distribution.

Data Minimization and Purpose Limitations. Perfect Phygital applies appropriate technical and organizational measures to ensure that the Processing of Personal Data is limited to its intended purposes.

Organisational security measures. Perfect Phygital has organisational measures to ensure confidentiality and data protection, such as restricting access to data to only those employees who need it to perform their duties, conducting regular cybersecurity training for staff, and developing data protection policies and procedures.

Internal audits and risk assessments. Perfect Phygital conducts regular internal audits and risk assessments to ensure that Our data protection processes comply with legal requirements and best practices. Any identified threats or vulnerabilities are addressed immediately.

In the event of a breach of Personal Data protection, Perfect Phygital has a clearly defined action plan, which includes immediate notification of the affected Data Subjects and relevant regulatory authorities, as well as measures to minimise the consequences of the breach.

XIII. Data Breach Notification

Response Team. If the Data Breach is detected, a team consisting of specialists, including external specialists, and the management of the Perfect Phygital will be established. The team will deal with eliminating Data Breach and/or minimizing any consequences. One of the authorized group members shall alert the DPA about the Data Breach and, if necessary or required, the affected Data Subjects.

Notification of Personal Data Protection Authorities. We will notify the relevant Data Protection Authority within the period established by law after we become aware of a Data Breach and provide the following information:

- A description of the nature of the Data Breach, its form, causes, approximate number and records;

- Name and contact details of the responsible person from whom more information can be obtained;
- Potential and expected effects of the Data Breach;
- Corrective measures and actions taken or suggested by Us to confront the Data Breach and reduce its negative impacts;
- Documents of the Data Breach and corrective actions taken by Us;
- Any other requirements required by the Data Protection Authority.

Notification of Data Subjects. If a Data Breach may lead to a violation of Your privacy and confidentiality, we will notify You of the Data Breach within the period established by law and provide the following information:

- The nature of the Data Breach;
- Name and contact details of the responsible person from whom more information can be obtained;
- Description of the possible consequences of the Data Breach;
- A description of the measures we have taken or proposed to take to address the Data Breach;
- Recommendations and tips to help the Data Subject reduce the risks of the Data Breach.

XIV. Contact information

Our contacts. You can contact Us with any questions regarding Your Personal Data or file a complaint by emailing Us at: perfect.phygital.events@gmail.com.

Our Processor's contacts. You can send an enquiry or submit a complaint to Processors using the available means of communication on their Websites.

Our Co-Controller's contacts. You can send an enquiry or submit a complaint to Processors using the available means of communication on their Websites.

The Data Protection Authorities. You can send Us a request regarding Your Personal Data or file a complaint with the Data Protection Authority. The timing and procedure for responding depends on the internal policies of the Data Protection Authority.

XV. Other conditions

Effective Date. This version of the Privacy Policy is effective as of the specified above effective date.

Changes. We may change this Privacy Policy from time to time without Your Consent. The new version comes into force from the moment it is published on the Bot.

Assignment. You cannot transfer or give away Your rights and responsibilities under this Privacy Policy without Our permission. If You try to do so, it will be invalid. We can give Our rights and responsibilities under this Agreement to someone else without asking for Your permission.

Applicable law. This Privacy Policy shall be interpreted in accordance with the laws of the UAE. The relevant court of the UAE shall resolve all disputes arising in connection with this Privacy Policy or its interpretation in accordance with the laws of the UAE.

Severability. If any provision of this Privacy Policy is held invalid or unenforceable, that provision will be deemed severable, and the remaining provisions will continue in full force

and effect. The invalid or unenforceable provision will be replaced by a valid and enforceable provision that accomplishes the same purpose as the original provision to the extent possible.

Language. This Privacy Policy may be available in several languages for Your convenience. In case of any discrepancies between versions in different languages, the English version shall prevail.