

SCOPE

This Privacy Notice (the "Notice") governs your use of Sanad Cash spend management system, which provides services accessible at www.sanadcash.com (the "System"). The System is operated by Sanad Cash for Financial Technology Company, a corporation established under the laws of the Kingdom of Saudi Arabia, with its registered office in Riyadh, Saudi Arabia, under Commercial Registration number 1010725921 and unified number 7023868784 (hereafter referred to as "Sanad Cash", "we", "us", or "our"). This Privacy Notice is an essential component of the System's terms and conditions.

This policy governs the collection, processing, and storage of personal information by Sanad Cash for Financial Technology Company, covering both online and offline interactions.

By using our services, you consent to the collection and use of your personal information as outlined in this policy.

The Personal Data We Collect

- Data Provided by You or through your authorized company Administrator:
 - Personal and Contact Information: Last name, first name, Email address, and contact phone number.
 - Company Information: Memorandum and articles of association, billing address, bank account information, passport for directors, beneficial owners, shareholders, and authorized signatories, as well as certified proof of address for the shareholders, directors, and authorized signatories
 - Login Information: Account login details, including login credentials and encrypted passwords.
 - Correspondence: Information you provide by filling out any of our forms or by communicating with us, whether face-to-face, by phone, email, online, or otherwise.
 - Marketing: Details of any marketing preferences you provide to us.

- Device Data:

We may collect information about the device you use to access our services, including your Internet Protocol (IP) address, device type, operating system, and browser type.

- Transaction Data:

Information related to your transactions, including account activities and the specific products or services utilized, will be collected.

- Service Usage Data:

We may collect insights into how you interact with our services, including the features you access, the pages you navigate, and the actions you perform.

- Use of Cookies and Other Tracking Technologies:

We use cookies and other tracking technologies to collect and store information about your interactions with our website. These technologies enhance your experience by personalizing content, improving functionality, and tailoring our services to your preferences. They may collect data such as your IP address, browser type, and information on how you navigate the site. Some cookies are essential for the operation of our website, while others help optimize performance and analyze site usage.

You can manage your cookie preferences through your browser settings, though disabling certain cookies may affect the functionality of our website.

Legal Basis for Processing Personal Data

We will process personal data in accordance with the lawful grounds outlined by the PDPL, which include obtaining your explicit consent before processing your personal data (**Consent**). In some cases, we may process your personal data when it is necessary for fulfilling a contract to which you are a party (**Contractual Requirement**). Additionally, we may process personal data to comply with legal obligations that apply to us (**Legal Obligation**). Furthermore, we may process personal data based on our legitimate business interests, provided that such processing does not override your fundamental rights (**Legitimate Interests**).

Purposes for Processing Your Information

At Sanad Cash for Financial Technology Company, we use the personal information we collect in various ways to provide and enhance our services. This includes the administration of our web and mobile applications, communication with you, and compliance with legal requirements. Here's how we may use your information:

- We process your information to enable you to create and access your account.
- Your data allows us to deliver and improve the functionality of our system through web and mobile application.
- We use your information to address your questions, resolve any problems, and provide assistance related to our services.
- We may send you important updates regarding our products, services, policies, or promotional offers.
- We process your information to handle orders, payments, and returns through our system.
- We conduct identity verification to protect you and ensure the security of our platforms, including monitoring and preventing fraudulent activities.
- Your information is used to ensure adherence to our Terms of Service and comply with regulations set by authorities within the Kingdom of Saudi Arabia.
- We analyze your interactions and usage trend analysis with our services to optimize performance and improve functionality.
- We may use automated decision-making or profiling processes in certain circumstances, such as fraud detection or risk analysis, to assess and detect potentially fraudulent or suspicious activities.

Personal Data Storage and Security

- We securely store your personal information on servers located in Saudi Arabia, implementing strict security measures to safeguard your data from unauthorized access, use, or disclosure. You are solely responsible for maintaining the security and confidentiality of your account username and password.
- Our storage systems are protected by both technical and organizational measures designed to ensure the confidentiality and integrity of your personal information.
- We regularly review and update our security protocols to ensure they align with the latest best practices and provide continued protection for your data.
- We keep your personal information for as long as necessary to fulfil the purposes outlined in this Privacy Policy or as required by applicable laws, including obligations related to tax, accounting, or other legal requirements.
- When we no longer need your personal information for business purposes, we will either delete or anonymize it. In cases where immediate deletion is not possible (e.g., data stored in backup archives), we securely store the data and prevent further processing until it can be removed.
- While we implement rigorous security measures, it's important to note that the internet is not entirely secure. We take all reasonable steps to protect your data in accordance with Saudi Arabia's data protection regulations.

Rights of Data Subjects

As a data subject under the Personal Data Protection Law (PDPL), you have specific rights, including:

- **Right to Access:** You may request access to the personal data we hold about you, subject to conditions that avoid impacting the rights of others.
- **Right to Obtain a Copy:** You can request a clear and readable copy of your personal data, provided it does not interfere with others' rights, such as intellectual property or trade secrets.
- **Right to Correction and Deletion:** You have the right to request the correction of inaccurate or incomplete personal data or request the deletion of data that is no longer necessary for its original purpose.
- **Right to Restrict Processing:** You may request a limitation on the processing of your personal data if there is a question regarding its accuracy or in other legally permitted circumstances.
- **Right to Destruction:** You can request the destruction of your personal data when it is no longer required for the purpose it was collected.
- **Right to Withdraw Consent:** If our processing of your data is based on your consent, you have the right to withdraw your consent at any time by contacting us.

To exercise these rights, please contact us via the methods provided in this policy. Upon receiving your request, we will respond within 30 days. In cases where multiple requests are made, or additional time is needed to handle complex requests, we may extend this period by another 30 days.

Sharing Your Personal Data

Sanad Cash may share your personal data with third parties, in full compliance with the Personal Data Protection Law (PDPL). We implement necessary safeguards to ensure your data remains protected during these transfers. The categories of recipients include:

- **Service Providers:** Third-party companies that offer services such as IT services, card management, and professional consultancy on our behalf. These partners help us deliver, improve, and customize our services for you.
- **Regulatory and Legal Authorities:** We may disclose your personal data to courts, regulatory bodies, or government authorities to comply with legal obligations or regulatory requirements within Saudi Arabia.
- **Business Partners:** We may share your personal data with third-party companies or clients to promote products and services, or to assist with key functions such as fraud prevention and payment processing.
- **Corporate Transactions:** In the event of a sale, merger, liquidation, receivership, or transfer of assets involving Sanad Cash or one of our affiliates, your personal data may be shared with potential buyers and their professional advisers.
- **Cross-Border Transfers:** For operational or technical reasons, your personal data may be transferred to, stored, or processed in countries outside Saudi Arabia. In such cases, we ensure that adequate safeguards, such as standard contractual clauses, are in place to protect your data.

Your personal data is primarily stored on servers located in Saudi Arabia. However, if external systems or services, such as cloud-based solutions outside the Kingdom, become necessary, we may transfer your data accordingly.

By using our services, you consent to the transfer, storage, and processing of your personal data both within and outside Saudi Arabia, in accordance with this Privacy Policy and applicable legal requirements. We will ensure that appropriate protections are applied through contractual agreements with service providers.

By accepting this policy, you permit us to contact you through channels such as SMS, push notifications, WhatsApp, email, and phone. This includes updates on our products and services, as well as advertising, awareness campaigns, and marketing materials that may be relevant to you.

Changes to this Privacy Policy

We may update this Privacy Policy periodically to ensure compliance with relevant laws and regulations. If we make any material changes, we will inform you by either prominently posting a notice within the app or website, or by sending you a direct notification, such as through email. By continuing to use our services after such updates, you acknowledge and accept the changes to this Privacy Policy.

Contact information

If you have any inquiries or require assistance regarding this Privacy Policy, or if you wish to exercise your rights under the Personal Data Protection Law, you can reach us at any time by emailing DP@sanadcash.com.