

Privacy policy for BOTTO PLATFORM - FZCO

Last updated: [Date]

1. Introduction

BOTTO PLATFORM - FZCO ("we," "our," "Company") respects your privacy. This Privacy Policy explains how we collect, use, disclose, and protect the personal information you provide to us when using our services, including, but not limited to, the [Robot Name] voice bot and the [Website Address] website (collectively, the "Services").

This policy complies with UAE Federal Law No. 45 of 2021 on the Protection of Personal Data ("PDPL") and other applicable laws of the United Arab Emirates. Our personal data processing activities are registered/notified to the UAE Data Protection Authority in accordance with the requirements of Article 9 of the PDPL.

By using our Services, you consent to the collection and use of information in accordance with this policy.

2. Data Controller

The data controller of your personal data is:

BOTTO PLATFORM - FZCO

License No.: 27443

Registered Office: IFZA Property FZCO

Physical Address: Dubai Silicon Oasis, DDP, Building A1, Dubai, United Arab Emirates

Data Protection Officer: For all inquiries related to this policy and data subject rights, please contact our DPO.

Email for privacy inquiries: [privacy@botto.ai]

3. What personal data do we collect

We may collect the following categories of personal data:

Data you provide: Information you voluntarily provide when registering, using a voice bot, or contacting our support team (name, email, phone number, voice recordings, content of your requests).

Data collected automatically:

Technical data: IP address, browser type, OS version, device type, unique device identifiers.

Usage data: Time and date of your requests, session duration, history of interactions with the voice robot, performance metrics.

Data from third-party sources: We may receive limited data from our business partners or service providers necessary to provide our Services.

4. Legal Basis and Purposes of Processing Your Data

We process your personal data based on the following legal grounds set out in the PDPL:

Performing a contract with you (to provide you with our Services).

Complying with our legal obligations (e.g., retaining data for tax purposes).

Our legitimate interests (to improve and protect our Services, to ensure security), provided they do not override your rights.

Your explicit consent (which you can withdraw at any time) – only for certain types of processing, such as marketing.

Specific purposes of processing include:

Providing, maintaining, and improving our Services.

Processing and analyzing voice requests to generate accurate responses.

Communicating with you, including sending notifications and responding to support requests.

Understanding how users interact with our Services for analytics and developing new features.

Protecting our rights and interests, and ensuring the security of our systems and users.

Complying with UAE law.

5. Disclosure and Transfer of Your Data

We may disclose your personal data to the following categories of recipients:

Service Providers (Data Processors): Third-party companies that provide services on our behalf, such as hosting, cloud computing (e.g., AWS, Microsoft Azure, Google Cloud), analytics, customer service, and marketing. These providers are contractually obligated to protect your data and use it only to provide services to us.

Business Partners: When necessary to provide you with a specific service (for example, if bot functionality is integrated with a partner's platform).

Government Authorities: We may disclose your information if required to do so by UAE law, a court order, or at the request of government authorities.

International Data Transfers: Your data may be transferred to and stored on servers outside the UAE. We will ensure that such transfers are carried out in accordance with the PDPL. We only use providers from jurisdictions deemed adequately protected by the Executive Council of the UAE Data Protection Authority, or we enter into agreements with them that provide a level of protection comparable to the provisions of the PDPL.

6. Protecting Your Data

We implement appropriate technical and organizational security measures to protect your personal data from unauthorized access, disclosure, modification, or destruction. These

measures include data encryption, controlling physical access to our servers, and limiting access to data to those employees who need it to perform their job tasks.

7. Data Retention Period

We will retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, including satisfying any legal, accounting, or reporting requirements. The criteria used to determine the retention period include the nature of the data, the purpose of processing, and the legal basis.

8. Your Rights under the PDPL

Under the PDPL, you have the right to:

Request access to your personal data.

Request correction of inaccurate or incomplete data.

Request deletion of your data when there is no longer a legal basis for processing it.

Revoke your consent to data processing at any time (this will not affect the lawfulness of processing carried out before the withdrawal).

Object to data processing based on legitimate interests.

Request that we suspend the processing of your data.

Right to opt-out of direct marketing: You may opt-out of receiving marketing communications from us at any time.

To exercise any of these rights, please contact our Data Protection Officer (DPO) at [privacy@botto.ai]. We will review your request and respond to it within 45 business days, as required by UAE law. If necessary, this period may be extended by an additional 15 business days, and we will notify you of the reasons for the extension.

9. Use of Cookies and Similar Technologies

Our website uses cookies and similar technologies to collect technical and usage data. You can manage your cookie settings through your browser.

10. Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page and indicating the "Last Updated" date. We recommend that you review this Privacy Policy periodically for any changes.

11. Contact Information

If you have any questions about this Privacy Policy or your rights, please contact us at:

BOTTO PLATFORM - FZCO

Attn: Data Protection Officer / Privacy Team

Address: Dubai Silicon Oasis, DDP, Building A1, Dubai, United Arab Emirates

Email: [privacy@botto.ai]