

PRIVACY POLICY & LEGAL INFORMATION

Last Updated: August 1, 2026

Effective Date: August 1, 2026

1. Introduction

GEM Strategy DMCC ("**Company**," "**we**," "**us**," or "**our**") respects your privacy and is committed to protecting your personal data. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website: **gem-strategy.com** (the "**Service**").

Please read this policy carefully. By accessing or using our Service, you agree to the collection and use of information in accordance with this policy. If you do not agree with the terms of this Privacy Policy, please do not access the Service.

We reserve the right to update or change this policy at any time. Any changes will be posted on this page with an updated revision date. We recommend that you review this page periodically for any changes. Your continued use of the Service after the posting of modifications constitutes your acceptance of such changes.

2. Contact Information

If you have any questions, concerns, or requests regarding this Privacy Policy, you can contact us using the details below:

- **Data Protection Officer / Grievance Officer:**
 - **Address:** GEM Strategy DMCC, Jumeirah Lake Towers, Cluster X, b.3, floor 27, office 2710, Dubai, United Arab Emirates
 - **Email:** info@gem-strategy.com
 - **Phone:** +971 45 52 50 39
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3. Information We Collect

We may collect and process the following personal data about you when you use our Service:

- **Contact Details:** Full Name, Email Address, and Mobile Phone Number.
- **Usage Data:** Information about how you interact with our website (e.g., pages visited, time spent, clicks).
- **Device Data:** Information about your device (e.g., browser type, operating system, IP address).

We do not knowingly collect sensitive personal data (such as racial or ethnic origin, political opinions, religious beliefs, or health information) unless you voluntarily provide it, and we will only process it with your explicit consent.

4. How We Use Your Information

We use the information we collect for the following purposes:

- **Service Delivery & Support:** To provide you with our consulting services, manage customer orders, and respond to your inquiries.
- **Marketing & Promotional Communications:** To send you newsletters, updates, and promotional materials related to our services (only with your consent, where required by law).
- **Administrative Information:** To manage your account, notify you about changes to our services, and maintain internal records.
- **Targeted Advertising:** To display personalized advertisements and content based on your interests (via cookies and similar technologies).
- **Analytics & Improvement:** To analyze website traffic and user behavior to improve our services and user experience.
- **Legal Compliance:** To comply with applicable laws, regulations, court orders, or other legal processes.

If we intend to use your information for any other purpose, we will seek your explicit consent before doing so.

5. Legal Basis for Processing (For GDPR Purposes)

If you are located in the European Economic Area (EEA), our legal basis for collecting and using your personal data depends on the specific context in which we collect it:

- **Contractual Necessity:** To perform a contract with you (e.g., provide consulting services).
 - **Legitimate Interests:** For our legitimate business interests (e.g., marketing, analytics, and improving our services), provided that they do not override your fundamental rights.
 - **Compliance:** To comply with a legal obligation.
 - **Consent:** Where we have your explicit consent to process your data for specific purposes (e.g., receiving marketing emails).
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6. How We Share Your Information

We do not sell or rent your personal information to third parties. However, we may share your information in the following limited circumstances:

- **Service Providers:** We may engage third-party companies and individuals to facilitate our Service (e.g., advertising services, analytics providers, data processors). These third parties have access to your personal information only to perform specific tasks on our behalf and are obligated not to disclose or use it for any other purpose.
 - **Legal Requirements:** We may disclose your information if required to do so by law or in response to valid requests by public authorities (e.g., a court or government agency).
 - **Business Transfer:** In the event of a merger, acquisition, reorganization, or sale of assets, your personal information may be transferred as part of the business assets to the new owner.
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7. Data Retention

We will retain your personal information only for as long as is necessary for the purposes set out in this Privacy Policy:

- **General Retention:** We retain your personal data for a period of **90 days to 2 years** after your account becomes inactive or after the completion of our engagement with you.
 - **Legal Requirements:** We may retain certain information for longer periods to comply with legal, regulatory, tax, or accounting obligations (e.g., record-keeping).
 - **Aggregated Data:** Aggregated information that does not identify you personally may be retained indefinitely for analytical purposes.
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8. Your Rights (Data Subject Rights)

Depending on your jurisdiction (particularly if you are in the EEA, UK, or UAE), you may have the following rights regarding your personal data:

- **Right of Access:** Request a copy of the personal data we hold about you.
- **Right to Rectification:** Request correction of inaccurate or incomplete data.
- **Right to Erasure ("Right to be Forgotten"):** Request deletion of your data under certain circumstances.
- **Right to Restriction:** Request restriction of processing your data.
- **Right to Data Portability:** Request transfer of your data to another service provider.
- **Right to Object:** Object to the processing of your data for marketing or legitimate interests.

- **Right to Withdraw Consent:** Withdraw your consent at any time (without affecting the lawfulness of processing based on consent before its withdrawal).
- **Right to Lodge a Complaint:** Lodge a complaint with a supervisory authority in your country.

How to Exercise Your Rights:

To exercise any of these rights, please contact us at info@gem-strategy.com. We will respond to your request within 30 days, as required by applicable law.

Please note: If you do not allow us to collect or process the required information, or if you withdraw your consent, you may not be able to access or use certain parts of our Service.

9. Cookies and Tracking Technologies

We use cookies and similar tracking technologies (e.g., web beacons, pixels) to enhance your experience, analyze trends, and serve targeted advertisements.

For more detailed information about the cookies we use, your choices, and how to manage your preferences, please refer to our separate **Cookie Policy**.

10. Data Security

We take reasonable and appropriate technical and organizational security measures to protect your personal information against accidental loss, unauthorized access, misuse, alteration, or disclosure.

However, please be aware that **no security system is impenetrable**. Due to the inherent nature of the internet, we cannot guarantee the absolute security of your data transmitted to our Service. Any transmission of personal data is at your own risk.

11. Third-Party Links

Our Service may contain links to third-party websites, applications, or services that are not owned or controlled by us (e.g., WhatsApp, social media platforms).

This Privacy Policy does not apply to those third-party services. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites. We strongly advise you to review the privacy policy of every site you visit.

12. Children's Privacy

Our Service is not directed at individuals under the age of 18 (or the legal age of majority in your jurisdiction). We do not knowingly collect personal information from children. If we

become aware that we have collected personal data from a child without parental consent, we will take steps to delete that information.

13. Disclosure for Legal Compliance

We may disclose your personal information in the good faith belief that such action is necessary to:

1. Comply with a legal obligation.
 2. Protect and defend our rights or property.
 3. Prevent or investigate possible wrongdoing in connection with the Service.
 4. Protect the personal safety of users of the Service or the public.
 5. Protect against legal liability.
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14. Miscellaneous

- **Transfer of Data Outside Your Country:** Your information, including personal data, may be transferred to - and maintained on - computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those in your jurisdiction. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.
- **Effective Date:** This policy is effective as of August 1, 2026.
- **Company Details:** GEM Strategy DMCC is registered in Dubai, UAE (License No: DMCC-931880).