

ANNEX II. PRIVACY POLICY

1.- Who is responsible for processing your data?

The data controller responsible for processing your personal data is **KoAI Consulting FZCO** (hereinafter, "KIZURI"), with Licence Number 58719 and registered office at Building A1, Dubai Digital Park, Dubai Silicon Oasis, Dubai, United Arab Emirates.

We inform you that the ownership of the Website: www.kizuri.app (hereinafter, "**the Website**") belongs to KIZURI.

This Privacy Policy regulates access to and use of the Website (hereinafter, the "**Website**") that KIZURI makes available to Internet Users (hereinafter, the "**Users**") interested in the content (hereinafter, the "**Content**") and services (hereinafter, the "**Services**") offered by KIZURI on the Website.

Users may contact KIZURI at the following email address: privacy@kizuri.app

2.- Recommendations

Please read and follow the following recommendations carefully:

- Keep your computer equipped with properly updated antivirus software against malicious software and spyware applications that could compromise your Internet browsing and the information stored on your computer.
- Read and review this Privacy Policy and all legal texts made available by KIZURI on the Website.

3.- Information about the data that KIZURI collects through the Website

For the proper functioning of the Website, KIZURI may have access to the following data provided, where applicable, by the User:

- i. Identification data:** Name, surname(s), identity document (ID card/foreign resident ID card/passport).
- ii. Contact details:** Email address, telephone number, postal address.
- iii. Browsing data:** IP address, type of device, operating system, browser, language, pages visited, browsing time and cookies or similar technologies (in accordance with **KIZURI's** [Cookie Policy](#))
- iv. Interaction data:** Information provided through contact forms, queries, complaints or communications with **KIZURI**.
- v. Administrative and billing data:** Only in applicable cases, bank or billing details required for the management of benefits, payments or refunds.

vi. Other data: Additional information provided by the User through forms, surveys or communication with KIZURI.

4.- Why is KIZURI entitled to process your data?

The legitimacy for the processing of Users' personal data through the Website may be based on different legal grounds, depending on the purpose of the processing:

- **User consent:** KIZURI will process the User's personal data when the User has given their express consent to do so. In this regard, the data may be processed to manage the services offered on the Website, provided that the User has accepted this Privacy Policy and ticked the corresponding boxes.
- **Performance of a contract:** In some cases, data processing is necessary for the performance of a contract to which the User is a party. This includes the management of purchases, reservations, subscriptions or other services contracted through the Website.
- **Compliance with a legal obligation:** KIZURI may process personal data when necessary to comply with an applicable legal obligation, such as tax, accounting or fraud prevention regulations.
- **Legitimate interest:** KIZURI may process personal data based on its legitimate interest, provided that this does not override the rights and freedoms of the User. This may include analysis of Website usage, information security, fraud prevention or sending commercial communications to existing Customers about similar products or services.

KIZURI takes the protection of Users' privacy and personal data very seriously. For this reason, data is stored securely and treated with the utmost care, in accordance with the provisions of **Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016** ("General Data Protection Regulation" or "GDPR").

Users may withdraw their consent at any time by sending a message to the following email address: privacy@kizuri.appsin. This will not affect the lawfulness of the processing based on the consent given prior to its withdrawal.

5.- What are the purposes of processing your personal data?

KIZURI will process its Users' personal data in a lawful, fair and transparent manner. The purposes of the processing include:

- Account management (managing user registration, account creation and access to the platform).
- Subscription and payment management.
- Customer service and technical support.
- Sending newsletters/promotions (always with express consent).

- Service improvement and usage analytics.
- Authentication and security.
- Security and fraud prevention.
- Contract management with influencers Service personalisation (adapting AI responses to the user's profile, language and preferences).
- Creation of tasks and summaries (recommendations, task lists, progress and journey maps).
- Gamification and challenges (assigning rewards, badges and progress (for users and influencers)).
- Usage analytics: analyse interaction metrics (time on platform, frequency of conversations, tasks completed, etc.).
- Basic commercial profiling: segmenting users according to usage to recommend new coaches or content.
- Management of GDPR rights requests: access, rectification, erasure, portability, objection, restriction.
- Collaborations between influencers (joint campaigns, global challenges).

6.- Accuracy of data provided by Users

The User guarantees the accuracy of the personal data provided and undertakes to notify KIZURI of any changes thereto. The User shall be responsible, in any case, for the accuracy of the data provided, and KIZURI reserves the right to exclude from the services any User who has provided false data, without prejudice to any other actions that may be applicable under the law.

Users are advised to protect their data with the utmost diligence using the appropriate security tools. KIZURI shall not be liable for any theft, illegal modification or loss of data. Any modification or update of the data must be communicated to KIZURI through the means of communication provided for in this Privacy Policy.

7.- Data retention

The protection of Users' privacy and personal data is very important to KIZURI. Therefore, KIZURI makes every effort to prevent the User's data from being used inappropriately. Only authorised personnel have access to the User's data.

The User's personal data will be retained for as long as their KIZURI account remains active for the purposes of the processing for which it has been provided, provided that the User has not revoked their consent by requesting the deletion of their account or the erasure of certain personal data from the Website.

Subsequently, if necessary, KIZURI will keep the information blocked for the legally established periods in general and specifically for chat histories and metrics, 2 years from the User's last activity.

KIZURI undertakes to comply with its obligation of secrecy and confidentiality of personal data in accordance with the provisions of applicable legislation.

8.- Users' rights

Users have the right to:

- i. Access their personal data;
- ii. Request the rectification of any inaccurate data;
- iii. Request the deletion of their data;
- iv. Request that the processing of their data be restricted;
- v. Object to the processing of their data;
- vi. Request the portability of your data;
- vii. Users also have the right not to be subject to decisions based solely on automated data processing.

Users may exercise all these rights by sending an email to the following address: privacy@kizuri.app, stating the reason for their request.

Users may also send their request by post to the following postal address: Building A1, Dubai Digital Park, Dubai Silicon Oasis, Dubai, United Arab Emirates.

Communications addressed to KIZURI must contain the following information.

- User's first and last names.
- Request specifying the application.

Without prejudice to any other administrative remedy or legal action, the User shall have the right to lodge a complaint with a Supervisory Authority, in particular in the Member State of their habitual residence, place of work or place of the alleged infringement, if they consider that the processing of their personal data does not comply with the regulations, or if they are not satisfied with the exercise of their rights. The supervisory authority to which the complaint has been lodged shall inform the complainant of the progress and outcome of the complaint.

9.- Data security

The protection of Users' privacy and personal data is very important to KIZURI. Therefore, KIZURI has taken all measures within its power to prevent your data from being misused, allowing access to it only to authorised personnel.

KIZURI maintains adequate security for the protection of personal data in accordance with applicable legislation and has established all technical means at its disposal to prevent the loss, misuse, alteration, unauthorised access and theft of data provided by the User through the Website, without prejudice to informing you that security measures on the Internet are not impregnable.

KIZURI undertakes to comply with the duty of secrecy and confidentiality with regard to personal data in accordance with applicable legislation.

KIZURI shall not be liable for any damages that may arise from the User's failure to comply with this obligation.

10.- Transfer or access to third parties

KIZURI informs the User that their personal data will not be transferred to third-party companies or entities, except in cases strictly necessary for the execution of the services contracted at or in compliance with a legal obligation (all in accordance with Article 28 of the GDPR). In particular, they may be communicated to financial institutions, payment gateways or technology operators solely for the purpose of processing payments, managing technical incidents or providing operational support for the Website's functionalities.

Under no circumstances will international data transfers outside the European Economic Area be made without first ensuring compliance with the appropriate safeguards required by current regulations, such as adequacy decisions by the European Commission, standard contractual clauses or equivalent mechanisms.

User data will be used exclusively by KIZURI to fulfil the purposes indicated in point 5 of this Privacy Policy and will be treated with the utmost confidentiality and security, without being shared with third parties for commercial or advertising purposes without the prior and express consent of the User.

11.-Changes

KIZURI reserves the right to revise its Privacy Policy at any time it deems appropriate. For this reason, we ask that you regularly check this Privacy Policy to read the most recent version.

However, any changes to this Privacy Policy will be communicated to the User.

12.- *Links to websites*

The KIZURI Website may include links to third-party websites, such as companies, platforms or external entities. KIZURI is not responsible for the way in which these entities manage the privacy and processing of Users' personal data.

For this reason, we recommend that Users carefully review the privacy policies and terms of use of any external website accessed through links on the Website, as their conditions may differ from those established by KIZURI.

The inclusion of these links on the Website does not necessarily imply KIZURI's approval, supervision or responsibility for the content, services or privacy policies of the linked pages.

13.- Questions

If you have any questions about our Privacy Policy, please contact us by sending an email to: privacy@kizuri.app

Likewise, if you consider that your rights are not being properly safeguarded, you have the right to lodge a complaint with the Spanish Data Protection Agency, whose contact details are: telephone 900 293 183; postal address C/Jorge Juan 6, 28001 Madrid; email <https://sedeaepd.gob.es/sede-electronica-web/> and website <https://www.aepd.es>.