Privacy Policy

Version 1. Date: March 27, 2024.

Purpose

At Utools Technologies LLC, the privacy of our customers is a foundational element of our operations. This Privacy Policy outlines our practices regarding the collection, use, and protection of personal information for individuals ("you") who engage with our services through our websites and applications, including but not limited to habi.ae, utools.ae, and our web application app.habi.ae (collectively referred to as the "Services").

Our Services, prominently featuring Habi, are designed to streamline the management and execution of tenancy contracts. Habi facilitates the creation, detailing, sharing, and electronic signing of tenancy agreements, tailored to the needs of our users within the real estate domain.

Please be aware that this Privacy Policy does not extend to any third-party websites or applications that may be accessible through our Services. We urge you to review the privacy policies of any such third-party platforms before engagement.

1. Collection of Personal Information

You have options regarding your interaction with our websites and applications, as well as the provision of your personal information to us. However, withholding certain personal information may limit your ability to fully utilize the functionalities of our Services. For instance, without providing a complete profile, you might not be able to create or sign tenancy contracts within Habi. To learn more about the choices available to you, please refer to Sections 5 of this Policy.

Personal Information We Collect from You. You provide us with personal information about yourself when you:

- Register or log in to your Habi account.
- Create or edit your landlord, tenant.
- Create or edit a property listing.
- Create, edit, or electronically sign a tenancy agreement.
- Confirm or decline participation in a tenancy agreement.
- Reach out to customer support.
- Participate in user surveys.

You also provide us with personal information about others when you use parts of our Services, such as when you:

- Add co-owners to your property listings.
- Enter tenant names or email addresses.
- Enter landlord names or email addresses.
- Engage in or initiate the electronic signing process for a tenancy contract.

- Refer friends to use Habi.

While you have the choice not to provide personal information, please note that withholding certain information may impact your ability to fully engage with our Services. For detailed information on the choices you have regarding your personal data, please see Section 5 of this Policy.

Examples of the categories of personal information you may provide are:

- Identifiers and Contact Information. This includes your full name, nationality, date of birth, email address, mailing address, and phone number, as well as electronic signatures you utilize within the platform.
- Personal Identification Numbers and Documents. This includes government-issued identification numbers such as Emirates ID and Passport Number, along with copies of these identification documents including visas and other personal documents.
- User-Generated Content. This includes your profile picture, photographs of properties, and digital copies of tenancy contracts and floorplans you upload or create through Habi.
- Company Information. If you're using Habi on behalf of a company, this may include your company's name, trade license number, and a copy of the company license.
- Company Representative Information. This includes the name and contact details of individuals authorized to act on behalf of a company, such as authorized signatories.
- User Preferences. Your settings within Habi, including contact preferences and your chosen role in the platform (as a landlord, tenant), along with your interface view preferences.
- Property and Legal Documentation. This includes copies of title deeds, detailed floorplans, and other property documents, as well as legal documents including the tenancy contracts, addendums, furniture lists, and the terms and conditions of contracts processed through our Services.
- Your Account Data. This includes your login information (email and password) and user profile information, including the profile photo, if uploaded.
- Payment and Transactional Information. If any future services provided by Habi require payment, this will include necessary billing and payment information for transaction processing. Currently, Habi does not collect this information.
- Customer Service and Communications. This includes queries, communications, or feedback provided through our support channels, and information collected during support interactions, including names, contact details, and the content of communications.

Please note that this list is not exhaustive, and we may collect additional types of information as necessary for the provision of our services.

Please be aware that Habi does not verify the information provided by users regarding other parties in the contract. Users are responsible for ensuring they are legally authorized to share that information and that such sharing adheres to all relevant laws and regulations.

Personal Information We Collect Automatically. We may automatically collect certain types of personal information when you use our Services, including when you visit our websites or apps without logging in. For options regarding the automatic collection of information, please see Section 5 of this Privacy Policy.

While using Habi, we may collect information about your interaction with our Services and the devices you use to access them. This collection is typically limited to:

- Device Data. This includes information like your IP address, unique device identifiers, and device attributes such as operating system and browser type.
- Usage Data. We gather data on how you use our Services, such as web log data, the pages you visit on our site, the frequency and duration of your visits, and other similar information. This may include your activities within the Habi platform, the sequence of your navigation, and the time spent on specific features.
- Transactional Data. For transactions processed through Habi, we may collect data related to these transactions, such as the history of actions you take within the platform (e.g., creating, editing, or signing tenancy agreements).

Some of this information is collected through the use of cookies and similar tracking technologies. Cookies are small text files downloaded onto your device that help us improve your experience and track usage of our Services. For more information on our use of cookies and how to manage them, please refer to our Cookies Policy and "Your Choices" below.

Personal Information We Collect from Other Sources. In addition to the information you provide directly, we may collect personal information about you from various external sources, always in compliance with applicable laws:

- Third-Party Authentication Services. If you use UAE Pass or Google for signing up or logging into Habi, these services will share specific personal information with us. For instance, UAE Pass provides us with details like your name and email ID, essential for authentication and setting up your Habi account. Logging in via Google similarly shares your Google account name and email address.
- Information from Other Users. As Habi facilitates interactions between landlords and tenants, other users, such as landlords or tenants, may provide personal information about you. This typically involves sharing contact details and necessary documentation related to tenancy agreements.
- Publicly Available Property Data. We collect property-related information from publicly available sources, such as the Dubai Land Department (DLD) databases. This information primarily concerns property details and is collected to augment the services we provide on Habi.
- Combining Information. The personal information acquired from these external sources may be combined with the information you provide us directly. This combination allows us to enhance and personalize your experience on Habi.

We do not control, supervise, or assume responsibility for how third parties who provide your personal information to us process that information. Any inquiries or requests regarding the disclosure of your personal information to Habi by third parties should be directed to those third parties. We manage all information collected in accordance with the guidelines and practices outlined in this Privacy Policy.

Personal Information We Collect & Process on Behalf of Customers. At Habi, we process and store personal information as part of providing our services to landlords and tenants. Our platform enables users to manage and engage in tenancy agreements, for which various personal and property-related documents are required.

- Users' Role. When landlords or tenants use Habi to create, manage, or sign tenancy agreements, they upload personal and property-related information onto our platform. In these instances, users are responsible for the accuracy and legality of the information they provide.
- Habi's Function. Our role is to facilitate the storage, management, and, where applicable, sharing of this information as per the functional requirements of the platform. However, Habi does not independently verify the content of the documents uploaded by the users.
- Data Processing. We ensure that the processing and storage of data are conducted securely and in compliance with applicable privacy laws and regulations.

This setup places the responsibility of data accuracy and legality on the users, while Habi provides the necessary tools and functionalities for effective property and tenancy management.

2. Use of Personal Data

In general, we use your personal data to provide, maintain, and improve our Services, develop new Services, and market our products and Services. Guided by our commitment to privacy and legal compliance, we manage personal data for various specific purposes:

- To Facilitate Rental Management. We use personal data to support the functionalities of our rental management platform. This includes creating and managing tenancy contracts, organizing property-related documents, and presenting your tenancy information in a user-friendly manner.
- To Personalize Services and Communication. Your information helps us tailor our services and communication to your needs. This might involve sending reminders, updates, and notifications relevant to your use of the platform.
- Improvement and Development of Services. Feedback and user data are vital for enhancing functionality and user experience on Habi. This includes developing new features that meet user needs and preferences.
- Security and Legal Compliance. Personal data is utilized to ensure the security of our platform and to comply with legal and regulatory requirements.
- Restriction on Sensitive Information Use. The use of sensitive personal data, such as identification numbers and specific tenancy terms, is strictly limited to necessary functions within the platform and is not used for any purposes beyond what is essential for Habi's services.
- Other Uses. We may aggregate the personal information we collect, or insights generated or derived from the use of our Services, or remove pieces of personal information ("de-identify") to limit or prevent identification of any particular user or device to help with goals like marketing, research and product development. Where such information has been aggregated and anonymized so that it is no longer considered personal information under applicable data protection law, this Policy does not apply.

We handle all personal data with a commitment to privacy and data protection, ensuring that our users' information is used responsibly and appropriately.

3. Sharing of Personal Data

Habi's commitment to privacy is fundamental, and we share your personal data only as necessary to facilitate the rental management process and in accordance with applicable laws. Here's how we share data:

- Between users. Essential personal details and documents required for tenancy agreements are shared between tenants and landlords through Habi. This includes sharing information within tenancy contract PDFs and on lease summary pages, ensuring both parties have access to necessary data, such as identification details and property documents like the Title Deed. Information and documents shared reflect the details that were current at the time of the lease agreement's signing.
- When you invite another user to participate in a lease as a tenant or co-owner, Habi facilitates this by allowing you to input their email address. If the invited user already has an account on Habi, their name may be visible to you. This fosters a streamlined process for inviting participants to leases and managing property ownership.
- Service Providers. To support the operation and improvement of our services, we share data with trusted service providers who perform various functions, such as hosting services, data analytics, and customer support. We have contracts with our service providers with applicable privacy and data protection language and controls that require the safeguarding and lawful and proper use of your personal information.
- Legal Compliance and Safety. We may disclose personal data to comply with legal obligations or to respond to lawful requests from public authorities. This includes sharing information for safety, fraud prevention, and legal proceedings.
- Corporate Transactions. In the event of a merger, acquisition, or asset sale, user data, including personal details, may be part of the transferred assets. Users will be informed prior to the transfer, ensuring transparency and providing an opportunity to review consent.
- Affiliates. We may disclose your personal information to other companies under common ownership or control with Habi. These companies use your personal information as described in this Policy.

We are dedicated to maintaining a transparent approach to how we share data, emphasizing the importance of privacy and security in all our operations. Habi does not independently verify personal information provided by users but facilitates its secure and appropriate use within the platform's functionality.

4. Storage of Personal Data

We retain your personal data only for as long as is necessary to fulfill the purposes for which it was collected, or as required by applicable laws and regulations.

- Duration of Storage. Personal data is stored for the duration of your use of our services, and until you request the deletion of your data.
- Account Deletion and Data Erasure. Upon receiving a request to delete an account, Habi will erase or archive the personal data associated with that account, except where we are required to retain certain information due to legal or regulatory obligations, or for safety, security, and fraud prevention purposes.
- Compliance and Legal Obligations. In cases where technical limitations prevent deletion or anonymization, we implement measures to safeguard personal information and restrict its active use.
- Request for Non-use. Should you wish to request that we no longer use your information to provide services, you are encouraged to contact us as specified in this privacy Policy.

Habi is dedicated to ensuring that your personal data is handled with care and respect, aligning with our privacy principles and legal standards.

5. Your Choices

This section outlines your options for managing, limiting, or modifying the collection, use, and sharing of your personal information within Habi:

- Profile Information. You are not required to fill out a profile. If you do, you can access and review this personal information. If any personal information is inaccurate or incomplete, you can make changes in your Profile.
- Marketing Communications. If you wish to stop receiving marketing emails from us, you can opt out by using the "unsubscribe" link provided in the email. Note that even after opting out, you may still receive essential transactional or service-related communications from us.
- Cookies and Similar Technologies. You can adjust your browser settings to decline cookies. Our Cookie Policy provides more information and guidance on managing cookies. Please be aware that blocking cookies may affect the functionality and accessibility of our Services.
- Location Sharing. For services requiring device location, you have the option to disable location sharing through your device settings or directly within your browser preferences.
- Account Closure. If you wish to close your Habi account, please request closure through your profile page or by contacting us at habi.ae/contact. Our support team is available to provide assistance or further information regarding account closure procedures.
- Feedback and Complaints. Habi values your feedback and is dedicated to addressing any concerns regarding your privacy or how we handle your personal information. For inquiries or to raise a complaint, please reach out to us via the contact details provided on our website.

We encourage you to review this section periodically to stay informed about your choices regarding your personal information at Habi.

6. International transfer of Personal Data

Habi may transfer your personal data outside your jurisdiction, including to the UAE and other countries. We primarily store and process personal information on servers located in the UAE. However, in facilitating certain operations such as the creation and digital signing of tenancy contracts, we may partner with third-party services like DocuSign, necessitating data transfers to their servers for processing.

- Safeguards. We implement appropriate safeguards in line with applicable legal standards to ensure your data is adequately protected, regardless of the transfer destination. This includes contractual obligations that require third parties to maintain the confidentiality and security of personal data and use it only for specified purposes.
- Legal Requirements. Transferred personal data may be subject to the legal requirements of the receiving jurisdiction, including disclosures to courts, law enforcement, or governmental authorities where legally mandated.

By using Habi's services, you acknowledge and consent to these international transfers and processing of your personal data, understanding the measures we take to safeguard your privacy

across borders.

7. Children's Privacy

Habi's services are not designed for individuals under 18 ("minors"). We do not knowingly collect personal information from minors or permit their use of our services. Should we discover any personal information collected from a minor without verified parental consent, it will be promptly deleted. Minors should refrain from using our services and providing any personal information. If you suspect we hold information from a minor without consent, please reach out at habi.ae/contact for its removal.

By submitting personal data of minors (e.g., children listed as co-owners on a Title Deed), you, as the legal parent or guardian, affirm your consent for us to collect, use, and process the child's information in line with this Policy.

8. How We Protect Your Personal Information

Habi is dedicated to safeguarding your personal information. We employ a combination of physical, technical, and organizational measures to protect your data from unauthorized access, misuse, alteration, or loss. Our approach includes:

- Secure Storage. User personal data is stored in a private, secure database within a protected network to prevent public internet access. Similarly, our application servers are securely housed to ensure data integrity.
- Document Protection. All user documents are stored in Amazon Simple Storage Service (AWS S3), with default private settings and standard encryption protocols to guard against unauthorized access.
- Access Control. Access to your personal data is strictly limited to Habi employees, agents, and contractors who need the information to perform their duties. All such parties are bound by confidentiality obligations and are instructed to process your data solely based on our directives.

For any concerns or questions about our security practices, please reach out to us through habi.ae/contact.

9. Cookies

Habi uses cookies and similar technologies to enhance and personalize your experience on our platform. Cookies are small text files stored on your device by websites, applications, online media, and advertisements that you access or use. Here's how we use cookies:

- Essential Services. Currently, we utilize strictly necessary cookies to ensure the effective operation and security of our platform, distinguishing you from other users and remembering your preferences and settings.
- Future Enhancements. As we strive to improve our services, we may integrate analytics tools that utilize cookies to understand user behaviors and interests better. This could include analyzing site traffic, determining content popularity, and enhancing service efficiency.
- Third-Party Analytics and Advertising. In the future, we may permit third-party services to provide audience measurement, analytics, and to serve advertisements on our behalf across the internet.

These services may use cookies, web beacons, and other technologies to identify your device when visiting our and other online platforms, tracking and reporting on advertisement performance.

We are committed to transparency regarding the use of cookies and will update our policies to reflect any changes in our use of this technology. For more information on managing cookies, please refer to our Cookie Policy.

We encourage you to periodically review this section to stay informed about our use of cookies and related technologies.

10. Changes to This Privacy Policy

We reserve the right to update this Privacy Policy periodically. Significant changes will be communicated to registered users. By continuing to use our services after such notifications, you consent to the updated terms, as permitted by law.

We encourage you to review this Privacy Policy regularly for the latest on our privacy practices.

11. How to Contact Us

For questions or complaints regarding our use of your personal information or this Policy, please visit habi.ae/contact and submit your inquiry.

Archived copy of habi.ae/privacy, Version 1 (27 March 2024), saved 29 September 2026.