

KnE Learn Privacy Policy
Last Updated: [19/09/2023]

INTRODUCTION

KnE Learn, a product of Knowledge E, is committed to protecting the privacy and security of personal data in accordance with the data privacy laws of the UAE and beyond. This policy outlines how KnE Learn collects, uses, discloses, and protects personal data as part of its training services. By engaging with its services, individuals consent to the practices described in this policy.

DATA COLLECTION AND PURPOSE

KnE Learn collects personal data from individuals to facilitate course enrollment, certificate issuance, course improvement based on feedback, and to provide newsletters and marketing materials based on training interests. The types of personal data KnE Learn collects includes names, email addresses, physical addresses, professional affiliations, and financial information required for payment processing.

LEGAL BASIS FOR DATA PROCESSING

All personal information processed by KnE Learn is done in accordance with the provisions of the 2015 ADGM Data Protection Regulations 2015, as amended and supplemented from time to time (“Data Protection Regulations”) and with KnE Learn’s rights and obligations under the Data Protection Regulations. Moreover, KnE Learn processes personal data based on consent and legitimate interests (for individuals who have filled out forms on its website), as well as contract fulfillment (for individuals who have contracted KnE Learn for training delivery).

DATA SUBJECT RIGHTS

Individuals have the right to inspect, correct, delete, withdraw consent, and file complaints about their personal data. To exercise these rights, contact Knowledge E’s data privacy department privacy@knowledgee.com.

DATA RETENTION

KnE Learn retains active individuals' data for the duration of their engagement in training. After ten years of inactivity, individuals will be notified that their data will be deleted unless they respond otherwise.

DATA SECURITY

KnE Learn ensures data security by leveraging technology delivery partners and hosting platforms, including Amazon Web Services (AWS), which adheres to

rigorous security measures. KnE Learn's technology partners conform to AWS security tools and services, including WAF, Shield, GuardDuty, Security Groups, KMS, and more.

THIRD-PARTY SHARING

KnE Learn collaborates with third-party technology partners, such as Drieam and Instructure, both hosted on AWS, and compliant with regional data protection principles. Data privacy and protection agreements are in place with these partners.

INTERNATIONAL DATA TRANSFERS

Select personal data, including name, email address, and login location is shared with KnE Learn's technology partners Drieam and Instructure, both utilizing AWS hosting, which adheres to strict security frameworks and continuous monitoring.

The following procedures are followed when transferring data within Knowledge E (and as an extension KnE Learn) or to external parties:

- **Data Transfer Authorisation:** Only authorised individuals initiate and approve data transfers, ensuring compliance with the Data Transfer Policy and relevant data protection regulations.
- **Data Transfer Documentation:** Data transfers are documented, including details such as the purpose, parties involved, data classification, and any applicable legal or contractual requirements.
- **Secure File Naming:** Files transferred are appropriately named to avoid any indication of sensitive content or compromise of confidentiality.
- **Recipient Verification:** Before transferring data to external parties, the recipient's identity and authority to receive the data is verified to prevent unauthorised access or disclosure.
- **Third-Party Agreements:** When transferring data to third-party vendors or service providers, appropriate data transfer agreements or contracts are in place to ensure data protection, confidentiality, and compliance with applicable regulations.
- **Data Transfer Monitoring:** Data transfers are logged and monitored to detect any unauthorised or suspicious activities. Any anomalies or security incidents should be reported immediately.

COOKIES AND INTERNET ADVERTISING

We and our Service Providers use cookies and other technologies (such as web beacons), as well as advertising identifiers, for various reasons. For example, we use these technologies to make it easy to access our services by remembering you when you return, to provide and analyse our services. We also use cookies, as well as advertising identifiers, to learn more about our users and their likely interests, and

to deliver and tailor marketing or advertising. We want you to be informed about our use of these technologies, so this section explains the types of technologies we may use, what they do and your choices regarding their use.

1. **What are cookies?** Cookies are small data files that are commonly stored on your device when you browse and use websites and online services. They are widely used to make websites work, or to work more efficiently, as well as to provide reporting information and assist with service or advertising personalisation. Cookies are not the only types of technology that enable this functionality; we also use other, similar types of technologies. See below for more information and examples.
2. **What are advertising identifiers?** Advertising identifiers are similar to cookies and are found on many mobile devices and tablets (for example, the “Identifier for Advertisers” (or IDFA) on Apple iOS devices and the “Google Advertising ID” on Android devices), and certain streaming media devices. Like cookies, advertising identifiers are used to make online advertising more relevant.
3. **Why does KnE Learn use cookies and advertising identifiers?**
 1. **Essential cookies** - These cookies are strictly necessary to provide our website or online service. For example, we and our Service Providers may use these cookies to authenticate and identify our members when they use our websites and applications so we can provide our service to them. They also help us to enforce our Terms of Use, prevent fraud and maintain the security of our service.
 2. **Performance and functionality cookies** - These cookies are not essential, but help us to personalise and enhance your online experience with KnE Learn. For example, they help us to remember your preferences and prevent you from needing to re-enter information you previously provided (for example, during member sign up). We also use these cookies to collect information (such as popular pages, conversion rates, viewing patterns, click-through and other information) about our visitors’ use of the KnE Learn service so that we can enhance and personalise our website and service and conduct market research. Deletion of these types of cookies may result in limited functionality of our service.
 3. **Advertising cookies and advertising identifiers** - These cookies and advertising identifiers use information about your use of this and other websites and apps, your response to ads and emails, and to deliver ads that are more relevant to you. These types of ads are called “interest-based advertising.” Many of the advertising cookies associated with our service belong to our Service Providers.
4. **How can I exercise choice regarding cookies and advertising identifiers?** To opt out of interest-based ads from KnE Learn in connection with an advertising identifier on a mobile device, tablet, or streaming media devices, please configure the appropriate setting on your device (usually found under “privacy” or “ads” in your device’s settings). You may still see KnE Learn ads

on your device, but they will not be tailored to your likely interests. At this time, we do not respond to Web browser “do not track” signals.

5. **How does KnE Learn use web beacons and other technologies?** Web beacons (also known as clear gifs or pixel tags) often work in conjunction with cookies. We and our Service Providers may use them for similar purposes as cookies, such as to understand and enhance the use of our service, improve site performance, monitor visitor traffic and actions on our site, and understand interactions with our marketing (including email and online ads on third party sites). Because web beacons often work in conjunction with cookies, in many cases, declining cookies will impair the effectiveness of web beacons associated with those cookies. We use other technologies that are similar to cookies, such as browser storage and plugins (e.g., HTML5, IndexedDB, and WebSQL). Like cookies, some of these technologies may store small amounts of data on your device. We may use these and various other technologies for similar purposes as cookies, such as to enforce our terms, prevent fraud, and analyse the use of our service. There are a number of ways to exercise choice regarding these technologies. For example, many popular browsers provide the ability to clear browser storage, commonly in the settings or preferences area; see your browser’s help function or support area to learn more. Other technologies, such as Silverlight storage, may be cleared from within the application.

DATA BREACH NOTIFICATION

In the event of a data transfer incident or breach, Knowledge E follows a structured incident response process:

- **Incident Identification:** Any suspected or confirmed data transfer incidents are promptly reported to the IT manager.
- **Incident Response Team:** An incident response, led by the IT manager, coordinates the response, investigation, and resolution of the incident.
- **Data Breach Notification:** If a data breach occurs, Knowledge E will comply with applicable laws and regulations regarding data breach notification to affected individuals and relevant authorities.
- **Remediation and Recovery:** Appropriate measures will be taken to mitigate the impact of the incident, recover lost or compromised data, and prevent future occurrences.

POLICY UPDATES

This policy will be regularly reviewed and updated to ensure ongoing compliance with regional data privacy laws.

By using our services, individuals acknowledge their understanding and acceptance of this data privacy policy.

For any inquiries regarding this policy, contact us at training@knowledgee.com.