

Dabalox Privacy Policy

Introduction

This is the Privacy Policy (the "**Policy**") for Dabalox Ltd covering www.dabalox.com (the "**Site**"), app.dabalox.com (the "**App**") and all other digital assets deployed to any subdomain of dabalox.com. The Site and App are operated by Dabalox Ltd ("we", "us", "our"). We are a limited company, registered in England with company number **16226548**, and registered offices at **2 FREDERICK STREET, KINGS CROSS, LONDON, WC1X 0ND**. For the purposes of the Data Protection Act 2018, we are the data controller. You can contact us at contact@dabalox.com.

We are committed to protecting your personal information and privacy online. We appreciate that you do not want your personal information distributed indiscriminately, and here we explain how we collect information, what we do with it, and what rights you have.

Information that identifies or can be used to identify a living individual is known as "Personal Data" or "Personally Identifiable Information" (**PII**). All organisations processing personal data must do so fairly, lawfully and in accordance with applicable data protection laws, including the Data Protection Law.

This includes the obligation for us to tell you how we will use your personal data. We treat all of our legal obligations seriously and take all steps necessary to ensure compliance when storing and processing your personal data.

By using our Site or App, you acknowledge that you have read and understood this privacy policy. We reserve the right to change this privacy policy from time to time by changing it on the Site, and any substantive changes will be notified to you by e-mail. This privacy policy was last updated on 5th January 2026.

Personal Data we may collect

We may collect and process the following personal data about you received

from you, or your interactions with us:

- Contact details (such as name, email address, phone number, and postal address) that are either uploaded to us via documents or captured via voice conversations and transcriptions.
- Information about your home
- Information about your financial circumstances
- Communications you send to us (e.g. queries or complaints) or other users of the App
- Information you enter into the App as part of conversations with the Dabalox Assistant
- Technical information that may include your IP address (and its inferred geographic location), your browser type and version, operating system
- Information about which pages you visit on the Site or functions you access within the App

We collect your personal data from you in a number of different ways, including the following:

- If you provide it when interacting and communicating with us (for example when registering for the App or using the Assistant)
- When you visit our Site or App (for example, by cookies, your IP address and other browser-generated information). More information about how we use cookies is provided in our cookies policy at www.dabalox.com/cookies.

Special Category Data

We do not in the normal course of our business aim to collect or process Special Category Data ("SCD"), as defined by the GDPR and listed below:

- Race
- Ethnic origin
- Politics
- Religion
- Trade union membership
- Genetics
- Biometrics

- Health
- Sex life
- Sexual orientation

We may, however, record SCD if you disclose it to us and process this data for specific and limited purposes. For example, your voice may be recorded during Note Taking to generate conversation transcriptions that enhance your usage of the App.

Cookies and Other Technologies

Cookies are small text files that the Site and App may store on your device to remember information about you or your visit, making the experience easier and more meaningful. For example, our cookies are used to remember you, making it easier to log in on your next visit. Internally, we also use cookies to help monitor aggregated usage of the Site and App to help us understand our users and improve the services and products we offer them.

How do we use your Personal Data?

We use your personal data as is necessary for the proper operation of the Site and App, our services, our systems, to protect us/our clients, or for the enforcement of our Terms and Conditions, or in our legitimate interest (where such interests are not overridden by your interests or fundamental rights and freedoms). We may also use your personal data collected from you for the following purposes:

- Dealing with any queries, complaints or problems reported by you
- Audit the access or downloading of data from the Site and App
- Enabling you to participate in the interactive features of the Site and App and ensuring content is presented in the most effective manner for you and your computer or device
- Notifying you about changes to our service and/or the terms on which the services are provided
- Generating statistics on our users, such as the popularity of certain of our services and about the "traffic" visiting our websites. Before doing this, your personal data is anonymised and you are not personally identifiable

Unless stated otherwise in this Policy, the legal basis for our use of your personal data will be that this information is processed for one or more of the legitimate interests described above and/or as is necessary for compliance with any legal obligation.

With whom is your Personal Data Shared?

You acknowledge that we may disclose your personal data to selected third-party service providers that may be located in or outside the European Economic Area (EEA). These may include:

- Organisations who process your personal data on our behalf and in accordance with our instructions and the Data Protection Law. This includes in supporting the services we offer through the site in particular those providing website and data hosting services, providing fulfilment services, distributing any communications we send, supporting or updating marketing lists, facilitating feedback on our services and providing IT support services from time to time. These organisations (which may include third party suppliers, agents, sub-contractors and/or other companies in our group) will only use your information to the extent necessary to perform their support functions.
- We may disclose your personal information to any of our affiliates, or to our agents or contractors who assist us in providing the services we offer through the Site, processing transactions, fulfilling requests for information, receiving and sending communications, updating marketing lists, analysing data, providing IT and other support services or in other tasks, from time to time. Our agents and contractors will only use your information to the extent necessary to perform their functions.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site and subject to the cookie section of this policy (this will not identify you as an individual).

Third parties to whom your personal data is disclosed may only use it for the purposes set out in this privacy policy.

If we transfer your data to a service provider outside of the EEA, we ensure that appropriate controls are in place to protect your data in accordance with applicable data protection laws, such as:

- The European Commission has made an official adequacy decision that the recipient country is a 'safe' country for the receipt of personal data; or
- We have entered into a form of contract with the service provider which has been approved by the European Commission as providing adequate protection for personal data, or if the service provider is in the US, it has self-certified to the EU/US Privacy Shield Framework.

We may disclose aggregate statistics about visitors to the Site, the App and clients in order to describe our services to prospective partners, advertisers, sponsors and other reputable third parties and for other lawful purposes, but these statistics will include no personally identifiable information.

In the event that we undergo re-organisation or are sold to a third party, you agree that any personal data we hold about you may be disclosed under appropriate confidentiality terms to our advisers and any prospective purchasers' advisers and will be transferred to that re-organised entity or the new owners.

We may disclose your personal information if required to do so by law or if we believe that such action is necessary to prevent fraud or cybercrime or to protect the Site or the rights, property or personal safety of any person.

External Links

The Site may, from time to time, contain links to external sites. We are not responsible for the privacy policies or the content of such sites.

Security and Safeguarding your Personal Data

We place great importance on the security of all personal information associated with our users and clients. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal information under our control. For example, our security and privacy policies are periodically reviewed and enhanced as necessary and only authorised personnel have access to personal information.

Whilst we cannot ensure or guarantee that loss, misuse or alteration of information will never occur, we use all reasonable efforts to prevent it. You should bear in mind that submission of information over the internet is never

entirely secure. We cannot guarantee the security of information you submit via the Site or App whilst it is in transit over the internet and any such submission is at your own risk. You can also help to protect your personal data, by following the guidelines below:

- If other people have access to your computer, remember to close your browser each time you log off and end your session and, if possible, clear any history of the websites you have visited and that your browser may have saved or “cached”
- Do not let anyone see your password, PIN or Security Details when viewing on any device
- Some devices allow you to use your fingerprint or face ID for logging in. If you enable this feature, then anyone whose fingerprint or face ID is registered on your device may be able to log in and view information and/or communicate with us or other valid users. Therefore, you must not activate this feature if you allow other people to access your device using their fingerprint or face ID. You should delete any other fingerprints or face ID registered on the device first. Otherwise, information submitted by anyone else who has their fingerprint or face ID registered on the device will be treated as being submitted by you
- Do not access your account via a jail-broken or rooted device. These devices have had their security features changed in order to work, which makes them less secure, and means that fraudsters could access your device
- Make sure that any device you use complies with the standards and requirements we tell you about from time to time
- Always use the latest versions of browser software to access the Site, in order to benefit from the most up-to-date security features
- Always use the latest version of the App and install software updates when released, as this will ensure you have the most up-to-date and robust security features available
- Never disclose or otherwise make available your account details to anyone.

Data Retention and Storage of your Personal Data

We will only keep your personal data for as long as we need to in order to

fulfil the relevant purpose(s) for which it was collected (as set out above in this policy) and for as long as we are required to keep it by law. We retain information about your interactions with the Site and App in order to enable us to deal with any legal issues for 6 years after submission. Site usage data will be retained for a period of 3 years so that we can monitor the performance of the Site.

Your personal information which we collect is sent to and stored on secure servers currently located in the UK. Such storage is necessary in order to process the information.

Personal information submitted may be transferred by us to our other offices and/or to the third parties mentioned in the circumstances described above (see 'With whom is your Personal Data Shared?') which may be situated outside the European Economic Area (EEA) and may be processed by staff operating outside the EEA. The countries concerned may not have similar data protection laws to the EEA. Where we transfer your personal information, we will take all reasonable steps to ensure that your privacy rights continue to be protected. By using the Site or App, you agree to this storing, processing and/or transfer.

Your Rights

You have the following rights (unless exemptions apply), which can be exercised by contacting us at contact@dabalox.com at any time. The right:

- To ask us not to process your personal data for marketing purposes
- To access personal information held about you and to obtain a copy of it (This is known as a Data Subject Access Request, or DSAR)
- To prevent any processing of a record of personal data that is causing, or is likely to cause, unwarranted and substantial damage or distress to you or another individual
- To obtain the rectification or completion of records of personal data which are inaccurate or incomplete
- To restrict or object to the processing of your personal data, including any profiling based upon it, and to request its erasure. We will not be able to erase personal data where we have a legal obligation to retain such data

- In certain circumstances, to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and the right to transmit that data to another data controller without hindrance; and
- To lodge a complaint with a supervisory authority about the ways in which your personal data is being shared

Where we rely on your consent to use your personal data, you have the right to withdraw that consent at any time by contacting us at contact@dabalo.com.

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority (see https://ec.europa.eu/info/law/law-topic/data-protection_en). The Information Commissioner is the supervisory authority in the UK and can provide further information about your rights and our obligations in relation to your personal data, as well as deal with any complaints that you have about our processing of your personal data.

Contacting Us

Please submit any questions, concerns or comments you have about this privacy policy or any requests concerning your personal data by email to contact@dabalo.com

Or by post to **2 FREDERICK STREET, KINGS CROSS, LONDON, WC1X 0ND**