

PRIVACY POLICY

FOR THE USE OF THE SERVANA PLATFORM

SERVICE GURU LIMITED LLC, a limited liability company registered in the Masdar City Free Zone, Abu Dhabi, United Arab Emirates ("Servana," "we," "us," or "our"), operates the Servana platform (the "Platform") and the website at <https://servanaservice.com/> (the "Website"). The Platform is a software-as-a-service solution that connects customers with qualified service providers for on-demand technical, maintenance, and professional field services. This Privacy Policy (the "Policy") explains how we collect, use, disclose, and safeguard personal data when you interact with the Platform or the Website, whether as a service provider, a corporate service provider, or a customer. It also outlines your choices and rights regarding Personal Information (data that identifies or can identify an individual) and how to contact us.

For the purposes of the **UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data** (the "UAE PDPL"), the **EU General Data Protection Regulation** (Regulation (EU) 2016/679) (the "EU GDPR"), and the **UK General Data Protection Regulation** as retained and amended under UK law, including by the Data (Use and Access) Act 2025 (the "UK GDPR"), Servana acts as the **Data Controller** of personal data collected through the Website and in connection with the management of **Client Accounts**. In respect of personal data processed through the Platform on behalf of Clients (including buyer names, contact details, and reservation information), Servana acts as the **Data Processor** and the Client acts as the **Data Controller**, in accordance with the Terms and Conditions governing the use of the Platform.

Please read this Policy carefully before using the Platform or accessing the Website. By accessing or using the Platform, the Website, or any of our services, you acknowledge that you have read, understood, and agree to this Policy.

1. INFORMATION WE COLLECT

We collect personal data directly from you, automatically through your use of the Platform or Website, and from third parties, as permitted by law.

1.1 Information necessary to deliver our services

- (a) **Identity and Profile:** Service provider's full legal name (or company name and trade license number, where applicable), professional qualifications, certifications, skills profile, service categories, and, where required by applicable law, passport number, Emirates ID, or equivalent government-issued identification details.
- (b) **Contact:** Email address, phone number, physical address, and, for corporate service provider accounts, the name, designation, and contact details of the authorised representative and any sub-account users.
- (c) **Billing and Financial Data:** Transaction-related financial information, including job fees, service commissions, subscription fees, payment status, invoices, penalties, adjustments, and payout records. We do not store payment card details; all card payments are processed by secure, third-party payment service providers.
- (d) **Service and Job Data:** Information submitted through the platform in connection with job performance, including service descriptions, job history, completion records, availability schedules, nominated service areas, and any materials uploaded to the service provider's profile or account.
- (e) **Subscription and Account Records:** Details of subscription tier, plan selection, billing cycle, account status, and any agreements or amendments entered into through the platform.

- (f) **Customer Data:** Information relating to customers who engage service providers through the platform, which may include the customer's name, contact details, site address, job requirements, and any feedback, ratings, or dispute records associated with completed jobs.
- (g) **Background and Compliance Data:** Where applicable and with the service provider's consent, information obtained through background screening, verification checks, or compliance assessments conducted in accordance with these terms.

1.2 Information collected automatically

When you access or use the platform, we automatically collect certain technical and usage information. This includes your IP address, device and browser type, operating system, pages viewed, features used, time spent on the platform, crash logs, and approximate location derived from your IP address. This information is collected via cookies and similar tracking technologies. We use this data to maintain and improve platform performance, ensure security, detect and prevent fraud, and analyse usage trends. For more information on the cookies we use, please refer to our Cookie Policy.

1.3 Information you choose to provide

You may voluntarily provide information such as business preferences, feedback, survey responses, or other notes when contacting us by email, phone, or other channels. This includes communications records for support and complaints.

1.4 Information from third parties

We may receive additional data from sign-in providers, payment processors, identity verification services, or affiliates. We combine such data with what you provide to deliver our services.

2. HOW WE USE INFORMATION

We process personal data only where a lawful basis applies. The purposes and corresponding legal bases are described below.

- (a) **Provide and manage the services (Contractual necessity / Legitimate interests):** We use identity, contact, billing, and service data to create and administer accounts, verify identity and professional qualifications, match service providers with jobs, process payments and commissions, and deliver platform services.
- (b) **Communications (Contractual necessity / Legitimate interests):** We use your contact details to send booking confirmations, job updates, invoices, payout notifications, changes to our services, and other transactional or support messages.
- (c) **Account management (Contractual necessity / Legitimate interests):** We use your data to provide Account access, enforce our Terms and Conditions, and notify you about changes.
- (d) **Customer support (Legitimate interests):** We use identity, contact, and communications data to troubleshoot issues, respond to enquiries, and resolve complaints.
- (e) **Platform monitoring and integrity (Legitimate interests):** We process usage data to maintain the integrity of the platform, detect misuse, ensure compliance with applicable law, and protect the rights and interests of Servana and its users.
- (f) **Marketing (Consent / Legitimate interests):** With your consent where required by law, we may send you promotional updates, personalised offers, and surveys via email or other channels.

- (g) ***Analytics and improvement (Legitimate interests)***: We analyse usage data to understand how the Platform and Website are used, evaluate performance, develop new features, and improve our services.
- (h) ***Security and fraud prevention (Legal obligations / Legitimate interests)***: We process data to detect and prevent fraud, enforce our agreements, and comply with legal obligations.
- (i) ***Aggregated statistics (Legitimate interests)***: We may anonymise personal data to create aggregated statistics that do not identify you. We use aggregated information to analyse trends, plan product improvements, and prepare reports.

3. WHEN WE PROCESS INFORMATION (LEGAL BASES)

We rely on:

- (a) **Contractual necessity**: To fulfil our contract with you (e.g., delivering services under the Terms and Conditions).
- (b) **Consent**: For optional uses (e.g., marketing, non-essential cookies); you can withdraw consent at any time.
- (c) **Legal obligations**: To comply with applicable law (e.g., tax, AML/KYC requirements, UAE PDPL, EU GDPR, UK GDPR).
- (d) **Legitimate interests**: For purposes such as service improvement, Platform integrity, security, reporting, and defending legal claims. We balance these interests against your rights and freedoms.

4. HOW WE DISCLOSE INFORMATION

We may share your data with the following categories of recipients:

- (a) **Service providers**: Companies that perform functions on our behalf, such as hosting, payment processing, communications, identity verification, background screening, analytics, and IT support, under confidentiality agreements.
- (b) **Authorities**: Public authorities, law enforcement agencies, or regulators where required by law or in connection with legal claims.
- (c) **Group companies**: Entities within our corporate group for internal administration, consolidated reporting, and support.
- (d) **Business transfers**: In the event of a merger, acquisition, or sale of assets, personal data may be transferred subject to applicable laws.
- (e) **Customers**: Where a customer engages a service provider through the platform, limited information necessary to facilitate the job, such as the customer's name, contact details, site address, and job requirements, is shared with the relevant service provider. Similarly, limited service provider information, such as name, qualifications, ratings, and availability, is shared with customers to enable informed selection and job coordination.

5. DATA RETENTION

We retain personal data only for as long as necessary to fulfil the purposes described above or to comply with legal obligations. Generally, this means:

- (a) **Active Accounts**: We keep your data while your Account remains active and you continue to use the Platform.
- (b) **After Account termination**: We retain identity, contact, service, and transaction records for up to five (5) years after termination to comply with our legal obligations (e.g., tax, anti-money laundering) and to defend legal claims.

- (c) **Legal requirements:** We may retain certain data longer if required by applicable laws, regulations, or to address legal proceedings, fraud, or security incidents.
- (d) **Aggregated and anonymised data:** We may retain anonymised or aggregated data indefinitely because it does not identify individuals.
- (e) **Consent-based data:** Where we process personal data on the basis of your consent (e.g., marketing communications or non-essential cookies), we retain that data until you withdraw your consent or the data is no longer necessary for the stated purpose. After withdrawal, we may retain a minimal record of your consent and its withdrawal in order to demonstrate compliance with applicable legal obligations.
- (f) **Background and compliance data:** Information obtained through background screening or verification checks is retained only for as long as necessary to fulfil the purpose for which it was collected, and in any event no longer than twelve (12) months after the service provider's account is terminated, unless a longer period is required by applicable law.

6. YOUR PRIVACY RIGHTS

Under the UAE PDPL, the EU GDPR, and the UK GDPR (as applicable to you), you may have the right to:

- (a) Access personal data we hold about you and receive information about how it is processed.
- (b) Rectify inaccurate or incomplete data.
- (c) Erase personal data in certain cases, subject to legal exemptions.
- (d) Restrict or stop processing in specific circumstances.
- (e) Receive your data in a structured, commonly used, machine-readable format (data portability).
- (f) Object to processing based on legitimate interests or to direct marketing.
- (g) Object to automated processing and request human intervention.

To exercise any of these rights, contact info@servanaservice.com. We may ask you to verify your identity. We aim to respond within one (1) month of receiving complete information. In complex cases or where we require additional details to identify your records, the one-month period may be paused until we receive the necessary information. We may extend the response period by up to two (2) additional months if your request is complex, and will inform you of any extension and the reasons for it.

Servana does not sell personal information for monetary or other valuable consideration. We share data only as described in this Policy.

If you have concerns about how we process your personal data, you may contact us at any time at info@servanaservice.com. We aim to respond to complaints within one (1) month. If your complaint is complex, we may extend this period by up to two (2) additional months, and will inform you of the extension and the reasons for it. You also have the right to lodge a complaint with the UAE Data Office, or with a supervisory authority in the EU or UK if the EU GDPR or UK GDPR applies to you.

7. SECURITY AND INCIDENT RESPONSE

We implement appropriate organisational and technical safeguards, including encryption, access controls, secure storage, staff confidentiality obligations, and monitoring, to protect personal information against accidental or unlawful destruction, loss, alteration, disclosure, or access. If a data breach occurs, we will notify you and relevant authorities where legally required.

8. COOKIES AND SIMILAR TECHNOLOGIES

The Platform and Website use cookies and similar technologies for functionality, analytics, and security purposes. Non-essential cookies are used only with your consent; you can manage your preferences or withdraw consent at any time via our cookie banner or your browser settings. For full details on the cookies we use, their purposes, duration, and how to control them, please refer to our Cookie Policy.

9. COMMUNICATIONS FROM SERVANA

Transactional communications (such as service confirmations, invoices, and support notifications) are necessary to perform our contract with you and cannot be opted out of. For promotional communications (e.g., newsletters or surveys), we will send such messages only with your consent where required. You may manage your preferences or withdraw consent at any time through the unsubscribe link in our communications or by contacting info@servanaservice.com.

10. THIRD-PARTY SITES

The Platform and Website may contain links to external websites with their own privacy practices. We are not responsible for these practices and encourage you to review their policies directly.

11. CROSS-BORDER DATA TRANSFERS

We may transfer personal data outside the United Arab Emirates where necessary for the provision of our services, including to service providers, hosting facilities, or group companies located in other jurisdictions. Any such transfers shall be conducted in accordance with the UAE PDPL. Where personal data relating to individuals protected by the EU GDPR or UK GDPR is transferred, such transfers shall be subject to appropriate safeguards to ensure an adequate level of protection for your personal data.

12. CHANGES TO THIS POLICY

We may update this Policy to reflect legal, technical, or business changes. We will indicate the effective date and provide notice where legally required. Continued use of the Platform or Website following notification of any changes shall constitute acceptance of the revised Policy.

13. CONTACT US

Questions, requests, or complaints regarding this Policy can be directed to:

Email: info@servanaservice.com

Last updated: 10th April, 2026