



WeMind LLC

Privacy Notice

Last updated: 20.01.2025

WeMind LLC

Meydan Grandstand / Meydan Road / Nad Al Sheba / Dubai
PO Box / 418630
License No / 2422324.01
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Subsidiary of TxFinTech LTD / DIFC / Dubai

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Introduction

WeMind LLC Dubai Meydan Free Zone Nad Al Sheba 418630 Dubai UAE Subsidiary of TX Fintech LTD DIFC Dubai License No.2422324.01, (doing business as WeMind) ("Company," "we," "us," or "our") by virtue of its provision of accounting and TAX representative services ("Services"), processes the personal data of their (potential) customers ("You").

This privacy notice describes how and why we process your personal data when you use our services, such as when you:

- Visit our website at www.wemind.tax or any website of ours that links to this privacy notice
- Download and use our application — Android and iOS mobile WeMind APP and web application available on our website www.wemind.tax
- Engage with us in other ways — including any sales or marketing events.

1. Who is responsible for processing personal data?

WeMind LLC Dubai (hereinafter "WeMind"), with registered offices in Dubai, UAE, registered in the Commercial Register of Meydan Free Zone under the register code 2422324.01 within the context of its activity and the scope of the services provided, collects personal data from You, acting as a data controller for the processing of personal data.

2. What are the purposes of personal data processing and the legal grounds?

Yours' personal data is processed under the terms of the applicable legislation for the following purposes and with the following legal basis:

Purpose	Description	Legal basis
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Provision of registration for accounting and TAX Representative services	Management of the data for further authorizations with FTA UAE and Banks for collecting / sending data via API protocols	Performance of the contract or necessary pre-contractual steps Compliance with legal obligations
Customer relationship Management	Management of the contractual relationship with customers Management of contacts, requests for information and complaints	Performance of the contract or necessary pre-contractual steps
Navigation through a website that enables You to use the different options that exist within it and enables us on other hand to better understand the visitors that come to our website (where they come from, and what content on our website is of	Technical and usage data are collected primarily by using cookies and similar tracking technology, as explained further in our Cookies Notice	Consent

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Waitlist and discount for our Services	Registration to a waitlist for our Services and obtaining a discount for early registration	Consent
Marketing and promotion of services	Sending commercial and marketing communications	Consent
Compliance with Anti Money Laundering obligations	Obligation to conduct Customer Due Diligence while onboarding customers by verifying their identity and passing related checks	Compliance with legal obligations
Compliance with other legal obligations	In order to prevent misuse and fraudulent behavior on our website and thus to protect our business, but also other visitors, as well as to response and response and reporting on judicial orders, administrative requisitions, or requests submitted by public authorities with their own or delegated	Compliance with legal obligations

3. What personal data do we process?

We collect and process personal data that you voluntarily provide to us through the available exchange platform or through expressing interest in obtaining information about us or our products and services.

- Personal data provided by You

The personal data that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The following categories of personal data are collected and processed:

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Purpose	Personal data
Provision of registration for accounting and TAX Representative services	- Full name of the APP user; - Email address; - Mobile Phone number;
Customer relationship Management	- Company name; - Company License; - Company MOA; - Company Proof of address; - VAT Number if registered with FTA; - Corporate TAX number if registered with FTA; - UBO data; - User/s Passport and EID copy;
Waitlist and discount for our Services	- Name and Surname (optional – if you want personalized notifications); - Email address; - Phone number.
Marketing and promotion of services	- Name (optional, if you would like more personalized services); - Email address.

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Compliance with Anti Money Laundering obligations	- General personal data full name, gender, personal identification code or number, date of birth, legal capacity, nationality and citizenship. - ID document data document type, issuing country, ID number, expiry date, MRZ, information embedded into document barcodes (may vary depending on the document), and security features. - Proof of Address/Residence document data - Phone number - Email address - Technical data software and hardware attributes (camera and device name). - Unique Identifier within We Mind APP system - Geolocation data IP address and domain name; general geographic location (e.g., city, country) from Data Subject's device. - Relevant publicly available data - Information regarding a person being a Politically
Compliance with Other legal obligations	- Any personal data related to a specific query made by public authorities, governmental bodies, or agencies.

All personal data that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal data.

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- Information automatically collected

We automatically collect certain information when you visit, use, or navigate our Services through cookies and similar technologies. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information on how and when you use our Services and other technical information. This information is primarily needed to maintain the security and operation of our Services and for our internal analytics and reporting purposes. We may only share this information in case of Your fraudulent behavior on our website. You can find out more about this in our [Cookies Notice](#).

- Information collected from other sources

If you choose to register to our Services via UAE pass (national digital identity for citizens and residents of the UAE) we collect your personal data from Digital Dubai and Telecommunications and Digital Government Regulatory Authority necessary for registration for accounting and TAX Representative services as stated above. In order to enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, social media platforms, and other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers.

Please note that if you want to follow us on social media platforms, we do not share data about you, but those social media platforms process your personal data, so you should read their privacy terms.

4. Do we process sensitive data?

No. We will process your biometric data in case you prefer to register to our Services via UAE pass application (facial recognition), as another way of your authentication (see "WHAT IS PERSONAL DATA WE PROCESS?" above), instead of providing your name, surname, email address, etc.

Please bear in mind that in this case your biometric data shall not be considered as a special category of personal data, because it shall not be used for the purpose of uniquely identifying a natural person, but only for the purpose of your authentication.

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5. How long do we retain personal data?

The personal data collected by WeMind LLC is processed in strict compliance with applicable legislation. Such personal data shall be kept in a format that shall allow the identification of the data subjects only for the period necessary for the purposes for which they were collected.

The period for which personal data is retained varies according to the purpose for which the collected information is used.

No purpose in this notice will require us to keep your personal data for longer than the period of time in which customers have an account with us. However, if applicable, we may retain some of your account information for a period of the statute of limitations under Dubai law.

If you are subscribed to marketing mailings and other promotion activities, your data will be processed until you unsubscribe.

Please note that we have a legal obligation to retain some of your personal data for five years after the relationship with a customer or after an occasional transaction to comply with record-keeping requirements of the Dubai AML/CFT regulation. There could be other legal requirements that require data to be retained for a certain period. Thus, whenever there is no specific legal requirement, the data will be stored and maintained only for the period necessary for the purposes for which they were collected, as identified above.

When we have no ongoing legitimate business need to process your personal data, we will either delete or anonymize such information; or, if this is not possible (for example, because your personal data has been stored in backup archives), we will securely store your personal data and isolate it from any further processing until deletion is possible.

6. How do we process your personal data?

The processing of your personal data includes any operation or set of operations performed upon personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage and archiving, adaptation or alteration, retrieval, consultations, use, disclosure by transmission, dissemination, transfer or otherwise making available, alignment or combination, restricting, erasure or destruction.

The way we process your personal data depends on how you interact with our Services and products.

- Account creation and service delivery

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We process your personal data so that you can create and log in to your account, as well as keep your account in working order. We also process your personal data to provide you with the requested service, including orders, payments, returns, and exchanges made through the Services. If necessary, we can process your personal data to send you details about our products and services, changes to our terms and policies, and other similar information.

- Service security

We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention during your use of the Services.

- Customers' support and feedback

We may process your personal data to respond to your inquiries and solve any potential issues you might have with the requested service. To facilitate the quality of our Services, we may process your personal data when necessary to request feedback and to contact you about your use of our Services.

- Customer-to-customer communications

We may process your personal data if you choose to use any of our offerings that allow for communication with another customer.

- Marketing and promotional communications

We may process the personal data you send to us for marketing purposes if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time. For more information, see "WHAT ARE YOUR PRIVACY RIGHTS?" below. We also may process your information to develop and display content and advertising based on statistical (anonymized) data. For more information about this, see our [Cookies Notice](#).

7. When and with whom do we share your personal data?

We may engage contractors (so-called service providers) acting as the data processors to process data in accordance with the personal data processing purpose. We may provide the service provider with collected personal data based on a respective agreement, which is designed to help safeguard and treat your personal data in line with our instructions and applicable law.

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When we utilize external processors for certain processing activities, we use only ones that provide sufficient guarantees to implement appropriate technical and organizational measures in such a manner that processing will meet our high data protection requirements and ensure the protection of your rights.

Additionally, we have strict due diligence procedures and measures in place and review, assess, and background check all processors before forming a business relationship. We obtain company documents, certifications, references, and ensure that the processor is adequate, appropriate, and effective for the task we are employing them for.

We share your Personal data with the following recipients:

- Amazon Web Services, Inc, USA, a cloud storage service provider;
- Zentrix Digital Kft Lagymányosi street 12, 1111 Budapest, Hungary, Tax Number HU27190881, Reg.Num: 01-09-387819 digital marketing agency;
- Bridgewater Labs doo Novi Sad, Republic of Serbia (<https://bridgewaterlabs.com/>), IT support service provider;
- Stripe Payments Europe Limited, Dublin, Ireland (<https://stripe.com/legal/privacy-center>), online payment platform provider.

We will ensure that those who receive personal data cannot do anything with it unless we have instructed them to do so. They will not share your personal data with any organization apart from us. They also commit to protecting the data they hold on to our behalf and to retain it for the period we instruct.

In case of any illegal actions when visiting and using our website, your personal data may be disclosed to appropriate authorities or bodies.

We may also share your data with agents or recipients who perform assessments of our compliance, audits, or other services for us and require such information to do that work.

We will ensure that those who receive personal data cannot do anything with it unless we have instructed them to do so. They will not share your personal data with any organization apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct.

We may potentially share or transfer your personal data in connection with, or during negotiations of, any merger, sale of our assets, financing, or acquisition of all or a portion of our business to another company.

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For the performance of a task carried out in the public interest and compliance with AML/CFT-related legal obligations to which we are subject, the customer's personal data may be disclosed to appropriate authorities or bodies.

8. What is our stance on third-party websites?

The website may link to third-party websites, online services, or mobile applications and/or contain advertisements from third parties that are not affiliated with us and which may link to other websites, services, or applications. Accordingly, we do not make any guarantee regarding any such third parties, and we will not be liable for any loss or damage caused by the use of such third-party websites, services, or applications. The inclusion of a link towards a third-party website, service, or application does not imply an endorsement by us. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy notice. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services, or applications that may be linked to or from the Services. You should review the policies of such third parties and contact them directly so they can respond to your questions.

9. Do we use cookies and other tracking technologies?

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our [Cookies Notice](#).

10. Is personal data transferred internationally?

Please be aware that your information may be transferred to, stored, and processed by us in our facilities and by recipients with whom we may share your personal data which are incorporated in other countries (see "WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?" above).

We may transfer any of your personal data to countries, territories, or international organizations that have proper protection level available. On the other hand, we could transfer your personal data to countries, territories, or international organizations that do not necessarily have proper protection level available, if one

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of the of the exemptions provided by the Article 23 of the [United Arab Emirates \(UAE\) Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data Protection](#) applies.

11. How do we keep your personal data safe?

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal data we process. However, despite our safeguards and efforts to secure your information in accordance with international standards, such as SOC 2, NIST, ISO 27001, ISO 27017 and ISO 27018., no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal data, the transmission of personal data to and from our Services is at your own risk. You should only access our Services within a secure environment.

12. Do we process personal data from minors?

We do not knowingly solicit data from or market to persons under 18 years of age. If we learn that personal data from persons less than 18 years of age has been collected, you won't be able to use the Services and we will take reasonable measures to delete such data from our records promptly. If you become aware of any data we may have collected from children under the age of 18, please contact us at support@wemind.tax.

13. What are your Privacy Rights?

- General

Under the [United Arab Emirates \(UAE\) Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data Protection](#), you have certain rights. These may include the right:

- (i) to withdraw consent where the basis for the processing of your personal data is consent;
- (ii) to receive information, request transfer of personal data, correction or erasure of personal data, restrict processing, stop processing and right to object to any decisions resulting from automated processing, including profiling, particularly those decisions which have legal impact on or adversely affect the Data Subject unless

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there are any derogations to execute these rights. Please note that sometimes we may execute these rights absolutely or partly (e.g. if there is another legal obligation vested on us, legal claim or other circumstances);

(iii) to lodge a complaint with the supervisory authority.

You can make such a request by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below. We will consider and act upon any request in accordance with applicable data protection laws.

Any requests are to be completed within a month period of receipt of the request. That period may be extended by two months where necessary, considering the complexity and number of the requests. In this case, we will inform you of any such extension within one month of receipt of the request, together with the reasons for the delay.

We guarantee that making a request for receiving personal data is free unless a reasonable cost is to be charged where requests are unfounded or excessive, or repetitive in character.

- **Withdrawing your consent**

You have the right to withdraw your consent at any time. You can do so any time by contacting us by using the contact details provided in the "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" section below or by updating your preferences.

However, please note that this will not affect the lawfulness of the processing before its withdrawal, nor will it, when applicable law allows, affect the processing of your personal data conducted in reliance on lawful processing grounds other than consent.

- **Opting out of waiting list or marketing and promotional communications (considering withdrawing consent)**

You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided in the "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" section below. You will then be removed from the waiting and/or marketing lists.

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14. Do we make updates to this Notice?

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date, and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

15. How can you contact us about this Notice?

If you have questions or comments about this notice, you may contact us by email at support@wemind.tax or by post to:

[WeMind L.L.C-FZ](#)

[Meydan Grandstand, 6th floor, Meydan Road, Nad Al Sheba](#)

[Dubai](#)

[United Arab Emirates](#)

If you have any further questions or comments, you may also contact us by email at info@wemind.tax or by post at the following corporate address:

[WeMind L.L.C-FZ](#)

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