

# **HAPPYU PRIVACY POLICY**

## **Article 1. INTRODUCTION AND PURPOSE**

Happy U is committed to protecting the privacy and personal data of all individuals who interact with our website, mobile platforms, and digital tools. This Privacy Policy explains how we collect, use, store, disclose, and safeguard your personal information when you visit our website, create an account, submit journal entries, or otherwise engage with our services.

We understand that wellness and self-reflection are deeply personal matters, and we take our role as a data custodian seriously. Whether you are a casual visitor or a registered user, your trust is important to us. This policy outlines our privacy practices in compliance with the applicable laws of the United Arab Emirates, including its data protection regulations, and where applicable, the European Union General Data Protection Regulation (GDPR).

By using our website and services, you consent to the practices described in this Privacy Policy. If you do not agree with this policy, we encourage you to refrain from using our services.

## **Article 2. DEFINITIONS**

2.1. For the purposes of this Privacy Policy, the following terms shall have the meanings set forth below:

- a. **“Personal Data”** means any information relating to an identified or identifiable individual, including but not limited to name, email address, IP address, journal entries, and behavioral data collected through our platform.
- b. **“Processing”** means any operation or set of operations performed on Personal Data, whether or not by automated means, including collection, recording, organization, structuring, storage, adaptation, retrieval, consultation, use, disclosure, transmission, dissemination, erasure, or destruction.
- c. **“User”** means any individual who accesses, browses, registers, or interacts with the Happy U website or any of its associated services, whether as a guest or a registered account holder.
- d. **“Data Controller”** means the natural or legal person who determines the purposes and means of the processing of Personal Data. For this policy, Happy U is the Data Controller.
- e. **“Data Processor”** means any third party that processes Personal Data on behalf of the Data Controller, such as hosting providers or analytics services.

- f. **“Third Party”** means any natural or legal person, public authority, agency, or body other than the User, Happy U, or those who are authorized to process data under the direct authority of Happy U.
- g. **“Consent”** means any freely given, specific, informed, and unambiguous indication of the User’s wishes by which they signify agreement to the processing of their Personal Data.
- a. **“Cookies”** means small text files placed on the User’s device to store preferences, enhance user experience, and analyze site usage.
- b. **“Platform”** means the Happy U website, mobile applications, web-based tools, or any other digital interface through which Users engage with our services.
- c. **“Applicable Laws”** means the data protection and privacy laws in effect in the United Arab Emirates and, where relevant, the European Union General Data Protection Regulation (GDPR).

### **Article 3. SCOPE OF THE POLICY**

- 3.1. This Privacy Policy applies to all individuals who access, browse, use, or otherwise interact with the Happy U website and digital platform, whether as visitors, registered users, contributors, or any other category of end user. It governs the collection, use, storage, disclosure, and protection of Personal Data obtained through the Happy U platform, including but not limited to user-submitted information, behavioral data, and data collected via cookies or integrated third-party services.
- 3.2. By using the Happy U website or services, you acknowledge and agree to the practices described in this Privacy Policy.

### **Article 4. DATA WE COLLECT**

- 4.1. Happy U may collect the following categories of Personal Data when you interact with our website, digital platform, or services:
  - a. **Identity and Contact Information:** Includes your full name, email address, phone number, and any other identifiers you voluntarily provide when registering, signing up for services, completing forms, or contacting us.
  - b. **Journal Content and User-Submitted Entries:** If you use journaling features or contribute reflections, notes, or any personal writings through our platform, we collect and store those entries as part of your account activity. These may contain sensitive personal thoughts or emotional insights and are treated with the highest confidentiality.
  - c. **Browsing and Technical Data:** We automatically collect data related to your interaction with our platform, which may include your IP address, device type,

operating system, browser type, language settings, referring URLs, page views, session duration, and general usage patterns. This may also include cookie data and analytics identifiers to help us improve your experience.

- d. **Communication and Support Records:** If you contact us for help, feedback, or support, we may collect the content of your messages along with any associated contact information and metadata.

4.2.All data is collected in accordance with applicable laws and only for purposes consistent with the services offered by Happy U.

## **Article 5. HOW WE COLLECT PERSONAL DATA**

5.1.Happy U collects Personal Data through various direct and automated means to provide and enhance our services. These include:

- a. **Voluntary Submissions:** We collect data you voluntarily provide when you complete forms on our website, register an account, participate in assessments or surveys, submit journal entries, request support, or communicate with us directly.
- b. **Account Creation and Platform Use:** When you create an account or access platform features such as digital journaling, wellness tools, or community spaces, we collect relevant data associated with your usage, profile settings, and activities.
- c. **Automated Technologies:** We use cookies, pixels, local storage, and similar tracking technologies to gather technical and behavioral data during your visit. This includes information about your device, browsing actions, pages visited, and engagement with platform features.
- d. **Third-Party Integrations:** Where applicable, we may receive limited data through integrated services such as analytics tools (e.g., Google Analytics), email marketing platforms, or secure payment processors. These third parties may independently collect data as governed by their own privacy policies.
- e. **Communications and Interactions:** Personal Data may be collected when you interact with us via email, chat, or other communication tools embedded within the platform, including customer service or support requests.

5.2.All data is collected in accordance with applicable data protection laws and is used solely for legitimate business and operational purposes.

## **Article 6. PURPOSES FOR DATA COLLECTION AND USE**

6.1.Happy U collects and processes Personal Data only for lawful and specific purposes necessary to support our platform's operations, improve user experience, and comply with legal obligations. These purposes include:

- a. **Service Delivery:** To create and maintain user accounts, provide access to digital journaling features, assessments, and other wellness tools offered through the platform.
- b. **Personalization and User Experience:** To tailor content, recommendations, and features based on user preferences, behavior, and profile information, enhancing the effectiveness of wellness journeys.
- c. **Communication and Support:** To respond to inquiries, provide customer support, send service-related notifications, and inform users of updates to our terms, services, or platform features.
- d. **Analytics and Platform Improvement:** To monitor usage trends, measure engagement, troubleshoot issues, and develop insights that guide the continuous improvement of our platform and services.
- e. **Legal and Regulatory Compliance:** To meet legal obligations under applicable data protection laws, including responding to lawful requests from regulatory authorities or to enforce our terms of service.
- f. **Marketing (if applicable and consented):** To send newsletters, offers, or other promotional content, only where the user has explicitly opted in or provided consent as required under GDPR or local laws.

6.2. Happy U does not use Personal Data for any purpose that is incompatible with the above-listed reasons and will never sell user data to third parties.

## **Article 7. LEGAL BASES FOR PROCESSING (GDPR-SPECIFIC)**

7.1. Where the General Data Protection Regulation (GDPR) applies, Happy U relies on the following lawful bases for processing Personal Data:

- a. **Consent:** We process Personal Data where the user has freely given informed and unambiguous consent for a specific purpose, such as receiving marketing communications, participating in research, or enabling optional platform features. Consent may be withdrawn at any time without affecting the lawfulness of prior processing.
- b. **Contractual Necessity:** Processing is necessary to perform our contractual obligations with the user, such as creating and managing accounts, providing journaling and wellness services, and responding to user requests or support needs.
- c. **Legitimate Interests:** We may process data for purposes that are reasonably necessary for our legitimate business interests, such as improving our platform, ensuring security, or conducting analytics, unless such interests are overridden by the user's data protection rights.

- d. **Legal Obligation:** We process Personal Data where it is required for compliance with applicable legal or regulatory obligations, such as responding to lawful data access requests or maintaining records for financial or audit purposes.

7.2. We ensure that all data processing is carried out with appropriate safeguards and in full compliance with applicable privacy laws, including GDPR and the UAE Federal Decree Law No. 45 of 2021 on Personal Data Protection.

## **Article 8. THIRD-PARTY ACCESS AND DATA SHARING**

8.1. All credit/debit cards details and personally identifiable information will NOT be stored, sold, shared, rented or leased to any third parties.

8.2. Happy U may share Personal Data with carefully selected third parties, but only to the extent necessary to operate the platform, deliver services, ensure legal compliance, and improve user experience. All such sharing is governed by strict contractual and technical safeguards to protect your data.

- a. **Hosting and Infrastructure Providers:** We store user data on secure servers operated by reputable hosting service providers who are contractually bound to process data in accordance with this Privacy Policy and applicable law.
- b. **Analytics and Performance Tools:** We may use third-party analytics services, such as Google Analytics, to track usage patterns and improve platform performance. These services may collect anonymized or pseudonymized data and are not permitted to use Personal Data for their own purposes.
- c. **Payment Processors:** When applicable, we may share payment-related data with licensed third-party payment gateways for transaction processing. These providers do not retain, share, or use Personal Data beyond what is required to process payments.
- d. <https://happyu.ae> will not pass any debit/credit card details to third parties.
- e. **Professional Advisors and Consultants:** We may provide access to qualified legal, accounting, or IT consultants under strict confidentiality obligations where necessary for business operations or legal compliance.
- f. **Legal and Regulatory Authorities:** We may disclose Personal Data where required by law, regulation, court order, or government request, or to establish, exercise, or defend legal claims.
- g. **Business Transfers:** In the event of a merger, acquisition, or other corporate restructuring, user data may be transferred as part of the transaction. Any such transfer will be subject to privacy protections at least as protective as those in this Policy.

8.3. We do not sell, rent, or otherwise disclose Personal Data to third parties for marketing or commercial purposes without your express consent.

## **Article 9. INTERNATIONAL TRANSFERS**

9.1. Happy U operates primarily from the United Arab Emirates (UAE) and may store or process personal data in other countries, including jurisdictions outside the European Economic Area (EEA). Where such international transfers occur, we ensure that appropriate safeguards are in place to protect your Personal Data in accordance with applicable data protection laws, including the UAE Personal Data Protection Law and the EU General Data Protection Regulation (GDPR), where applicable.

- a. **Data Storage Locations:** Our platform and associated services may store or process data on servers located in jurisdictions such as the United States, the European Union, or other countries that may not have data protection laws equivalent to those in your home jurisdiction.
- b. **Legal Mechanisms for Data Transfers:** Where we transfer Personal Data internationally, we rely on one or more of the following legal mechanisms:
  - i. **Adequacy Decisions** from the European Commission, where applicable;
  - ii. **Standard Contractual Clauses (SCCs)** approved by the European Commission;
  - iii. **Contractual agreements and technical safeguards** ensuring similar levels of data protection as under UAE or EU law.
- c. **Your Rights in Cross-Border Scenarios:** Even if your data is transferred outside your jurisdiction, your rights as a data subject under applicable laws (such as the GDPR) will be preserved and protected through appropriate legal contracts and security controls.

## **Article 10. USER RIGHTS**

10.1. As a data subject, you have several rights concerning your personal data under applicable data protection laws, including the General Data Protection Regulation (GDPR) where applicable. You have the right to request access to your personal data held by us, as well as the right to request rectification if the data is inaccurate or incomplete. You may also request the erasure of your data (“right to be forgotten”) when it is no longer necessary for the purposes for which it was collected, subject to legal obligations. Additionally, you have the right to restrict or object to the processing of your personal data in certain circumstances, including for direct marketing purposes. Where processing is based on your consent or carried out by automated means, you may also have the right to data portability. Furthermore, you have the right to lodge a complaint with the relevant supervisory authority if you believe that your data protection rights have been violated. We are

committed to honoring these rights and will respond to all legitimate requests within the timeframe required by law.

#### **Article 11.RETENTION OF PERSONAL DATA**

11.1. We retain personal data only for as long as is necessary to fulfill the purposes for which it was collected, including to satisfy any legal, accounting, or reporting requirements. The retention period may vary depending on the type of data, the nature of the relationship with the user, and any legal or regulatory obligations that apply. For example, data related to purchases, user accounts, or customer support interactions may be retained for a longer period to comply with tax, contractual, or consumer protection laws. Journal entries and wellness-related content may be retained for as long as the user maintains an active account unless deletion is requested. Once the retention period expires or the data is no longer needed, we securely delete or anonymize the information. In cases where data is used for statistical or research purposes, we may continue to use it in anonymized form so that it can no longer be associated with any individual.

#### **Article 12.DATA SECURITY MEASURES**

12.1. We take the security of your Personal Data seriously and implement appropriate technical and organizational measures to protect it against unauthorized access, loss, misuse, alteration, or disclosure. All data transmitted to and from our platform is protected using industry-standard encryption protocols (such as TLS/SSL). Your data is stored in secure servers managed by trusted third-party service providers who are contractually obligated to maintain strict data protection standards in accordance with applicable laws.

12.2. Access to your Personal Data is restricted to authorized personnel who require it to perform their job responsibilities. These individuals are bound by strict confidentiality obligations and undergo regular training on data protection and privacy practices. We also maintain internal access controls, including role-based permissions, two-factor authentication for system access, and routine audits to monitor for unauthorized activity.

12.3. Despite our efforts, no system can be completely secure. Therefore, we encourage you to take precautions when sharing sensitive information online and to notify us immediately if you suspect any breach or unauthorized use of your information.

12.4. <https://happyu.ae> takes appropriate steps to ensure data privacy and security including through various hardware and software methodologies. However, <https://happyu.ae> (website) cannot guarantee the security of any information that is disclosed online.

#### **Article 13.COOKIES AND SIMILAR TECHNOLOGIES**

13.1. Our website uses cookies and similar tracking technologies to enhance your browsing experience, analyze site traffic, and understand user behavior. Cookies are small text files



placed on your device when you visit our site, which help us remember your preferences, improve site performance, and deliver more relevant content. These may include essential cookies (necessary for site functionality), performance cookies (used for analytics), and preference cookies (used to store user settings).

13.2. By continuing to use our website, you consent to the placement of cookies on your device, unless you have disabled them through your browser settings. When you first visit the website, you will be presented with a cookie banner that provides you with clear information about our use of cookies and allows you to manage your consent preferences.

13.3. You can modify your cookie preferences at any time by adjusting your browser settings to accept or reject cookies, or by revisiting the cookie banner settings on our site. Please note that disabling cookies may affect certain functionalities or features of the website.

#### **Article 14.CHILDREN’S DATA**

14.1. Our services are not directed to individuals under the age of 18, and we do not knowingly collect or process personal data from children. If we become aware that we have collected personal data from a minor without verified parental or legal guardian consent, we will take immediate steps to delete such information. Users must confirm that they meet the minimum age requirement and have the legal capacity to use our services in accordance with applicable laws. Parents or guardians who believe that their child has provided personal data to us without their consent may contact us using the details provided in this Policy, and we will promptly address the concern.

#### **Article 15.LINKS TO THIRD-PARTY SITES**

15.1. Our website and digital platform may contain links to third-party websites or services that are not operated or controlled by Happy U. We do not endorse or assume any responsibility for the content, privacy practices, or terms of use of such external sites. Users access these third-party websites at their own risk, and we encourage them to review the privacy policies and terms of those sites before providing any personal data. Happy U disclaims all liability arising from users’ interactions with or reliance on third-party platforms. <https://happyu.ae> is not responsible for the privacy policies of websites to which it links. If you provide any information to such third parties different rules regarding the collection and use of your personal information may apply. You should contact these entities directly if you have any questions about their use of the information that they collect.

#### **Article 16.CHANGES TO THIS PRIVACY POLICY**

16.1. Happy U reserves the right to update or modify this Privacy Policy at any time to reflect changes in legal requirements, our data practices, or the features of our services. When material changes are made, we will notify users through appropriate means such as email, prominent notices on the website, or through the user dashboard. We encourage all users to periodically review this Privacy Policy to stay informed about how we collect, use, and



protect their personal data. Continued use of the platform after such updates constitutes acceptance of the revised policy.

The Website Policies and Terms & Conditions may be changed or updated occasionally to meet the requirements and standards. Therefore, the Customers are encouraged to frequently visit these sections to be updated about the changes on the website. Modifications will be effective on the day they are posted.

#### **Article 17. CONTACT US**

If you have any questions, concerns, or requests regarding this Privacy Policy or the way your personal data is processed, you may contact us using the details provided below. We are committed to addressing inquiries in a timely and transparent manner. You may reach Happy U at:

#### **Happy U FZE**

Meydan Grandstand, 6th Floor, Meydan Road  
Nad Al Sheba, Dubai, U.A.E.

Email: [support@happyu.ae](mailto:support@happyu.ae)

Phone: 00971585122424

Please include sufficient details in your communication so we can effectively respond to your query or concern.