

Privacy Policy.

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This Privacy Policy explains how **EchoNova AI L.L.C-FZ** (trade licence no. 2650442.01, Meydan Free Zone, Dubai; "**EchoNova**", "**we**", "**us**") handles personal data when you visit **echonova.ai**, contact us, or hold an account on the EchoNova platform, including **Sada** (together, the "**Services**").

1. Two different roles: when this Policy applies

We are the controller (we decide why and how the data is used) for:

- people who visit our website or read our content;
- people who contact us, ask for a demo, or apply for a job;
- the business users who hold accounts on our platform (our customers' staff: their names, logins, and use of the dashboard);
- self-serve account holders (people and companies on the Free Trial, Starter, Growth and Scale plans), for their account, billing and usage data. For the text and audio they submit or generate, section 9A applies.

We are a processor (we act only on our customer's instructions) for the people who talk to an EchoNova AI assistant run by one of our business customers, for example, someone who phones a bank, or messages a clinic on WhatsApp, and is answered by Sada. In that case **the business you contacted is responsible for your data** and its own privacy notice applies. We process that data only to provide the service to that business, under a written data processing agreement. If you contact us about such data, we will pass your request to the business concerned.

Section 9 explains what we do with conversation data in more detail.

2. Personal data we collect (as controller)

CATEGORY	EXAMPLES	SOURCE
Contact and account details	name, work email, phone number, company, job title, login credentials	you, or your employer when it opens an account for you
Communications	emails, demo requests, support tickets, feedback	you
Usage and device data	pages visited, features used, IP address, browser and device type, approximate location (city/country), error logs	collected automatically (see our Cookie Notice)

CATEGORY	EXAMPLES	SOURCE
Billing data	billing contact, invoices, payment status. Card details are handled by our payment provider; we do not store full card numbers.	you or your employer
Recruitment data	CV, cover letter, interview notes	you

We do not intentionally collect sensitive personal data (such as health, religion, or biometric data) about website visitors or account users. Please do not send it to us.

3. Why we use it and our legal basis

PURPOSE	LEGAL BASIS
Provide and secure the Services and your account; support	performance of our contract with you or your employer
Answer enquiries and demo requests	your request (steps before a contract) and, where required, your consent
Billing, tax, accounting, and responding to lawful requests from authorities	compliance with our legal obligations
Website analytics (non-essential cookies)	your consent, given through our cookie banner
Marketing emails	your consent; you can unsubscribe at any time
Preventing fraud and abuse; enforcing our terms; defending legal claims	compliance with law and establishing or defending legal claims; in Saudi Arabia and the EEA, also our legitimate interests

UAE: under the UAE Personal Data Protection Law (Federal Decree-Law No. 45 of 2021, the "**UAE PDPL**"), processing is based on your consent unless one of the cases listed in the law applies, such as performing a contract with you or complying with a legal obligation. Where we rely on consent, you may withdraw it at any time; this does not affect processing that already took place.

4. Who we share it with

- **Hosting and infrastructure providers** that run our Services: Amazon Web Services and Microsoft Azure.
- **Other service providers** that act on our instructions, for example email, analytics, customer support and payment providers. A current list is published at echonova.ai/trust/subprocessors.
- **Professional advisers** (lawyers, auditors, accountants) under confidentiality duties.
- **Authorities**, where UAE, Saudi or other applicable law requires it.
- **A buyer or successor**, if all or part of our business is sold or reorganised, under confidentiality protections.

We do not sell personal data, and we do not share it for third-party advertising.

5. International transfers

We are based in the UAE and serve customers in the UAE and Saudi Arabia. Our Services run on Amazon Web Services and Microsoft Azure. The regions in use are listed on our subprocessor page at echonova.ai/trust/subprocessors, and some service providers process data in other countries.

When personal data leaves the UAE, we transfer it only as the UAE PDPL permits: to countries whose laws provide adequate protection, or otherwise under one of the conditions in the law, for example a contract that requires the recipient to protect the data to the UAE standard, or your express consent. Transfers out of Saudi Arabia follow the Saudi transfer regulations. Transfers out of the EEA use appropriate safeguards such as the European Commission's standard contractual clauses.

6. How long we keep it

DATA	RETENTION
Account data	while the account is active, then 12 months, unless the law requires longer
Billing records	5 years, or longer where UAE tax and commercial law requires
Enquiries and demo requests	24 months after our last contact
Analytics data	14 months
Recruitment data	12 months after the role is filled, unless you agree to us keeping it longer
Generation records (account, time, voice, identifiers, network data)	12 months
Submitted text and generated audio	90 days, unless a misuse report puts them on hold

When the retention period ends, we delete the data or make it anonymous.

7. Security

We use technical and organisational measures appropriate to the risk, and we are building our information security management system towards the ISO/IEC 27001 and ISO/IEC 42001 standards. No system is completely secure. If a breach affects your personal data, we will notify the competent authority and, where the law requires, you.

8. Your rights

Depending on where you are, you have the right to:

- be told what data we hold about you and how we use it, and get a copy;
- have inaccurate data corrected;
- have your data deleted, or its use restricted, in the cases the law allows;

- stop processing, including direct marketing;
- receive your data in a structured, machine-readable form and have it transferred to another provider;
- object to decisions about you made solely by automated processing, where these have legal or similarly significant effects;
- withdraw consent at any time.

To exercise a right, email privacy@echonova.ai. We may need to verify your identity. We will respond within the period set by applicable law.

Complaints. You can complain to us first. You can also complain to the **UAE Data Office**; in Saudi Arabia, to the **Saudi Data & AI Authority (SDAIA)**; and in the EEA, to your local data protection authority.

9. Conversation data (calls, voice and messages)

When a business uses EchoNova to answer its customers by phone, WhatsApp, SMS, chat or email, the platform processes the conversation for that business, including:

- audio recordings of calls and voice notes;
- transcripts and messages;
- phone numbers, names and anything else the caller chooses to say;
- AI-generated summaries, classifications and actions (for example a booking).

That business is the controller. It decides whether conversations are recorded, how long they are kept, and is responsible for telling callers and obtaining any consent the law requires. EchoNova processes this data **only to provide the service to that business**, under a data processing agreement.

We use conversation data to train and improve our AI models, de-identified where possible, unless the business has turned this off in its account settings. The business is responsible for telling its callers about this use.

9A. Generation records and watermarks

When you generate audio or text on the platform, we keep a record of the generation (account, time, voice used, identifiers of the input and output, IP address and device data) for up to 12 months, and the submitted text and generated audio for 90 days. We use these records to bill you, secure the platform, and investigate reports of misuse under our Acceptable Use Policy and Voice Usage Policy. We also use the text and audio you submit and generate to train and improve our models, de-identified where possible, unless you turn this off in Settings > Data use (Platform Terms, section 4.2). Every audio file generated on the platform carries an inaudible watermark identifying it as produced by EchoNova. If a person affected by a misuse report, including a voice owner, asks us for evidence, we may provide the relevant records and audio to them, and to the competent authorities where the law requires it.

9B. Voice data

A voice is personal data, and under the UAE and Saudi laws a voiceprint can be biometric data. We handle it as follows:

- **Voice artists:** recordings and the voice model built from them are kept under the artist's signed agreement and the Voice Artist Terms, in secure storage, and never given to any third party.

- **Voice cloning by account holders:** we create a clone only from your own voice or from a voice whose owner has given documented consent. We keep the consent recording and any ID you provide with the clone record. You can delete a clone you created at any time from your account; the model is deleted within 30 days.
- **Callers to our customers' assistants:** call audio is processed for the customer that runs the assistant, as a processor (section 9). We do not create voiceprints of callers unless the customer has enabled that feature and confirmed the caller's explicit consent.
- **Demos and the playground:** voice samples you submit are processed to generate the demo and are not kept beyond the retention periods in section 6.

10. Children

The Services are for businesses and are not directed at anyone under 18. We do not knowingly collect personal data from children as controller. If you believe we have, contact us and we will delete it.

11. Data protection contact

EchoNova AI L.L.C-FZ Meydan Grandstand, 6th floor, Meydan Road, Nad Al Sheba, Dubai, United Arab Emirates Email: privacy@echonova.ai

We do not offer the Services in the European Economic Area.

12. Changes

We will post any update on this page with a new "last updated" date. If a change is significant, we will also notify account holders by email before it takes effect.

13. Language

This Policy is published in Arabic and English. Where UAE law requires the Arabic version to prevail, it prevails; otherwise the two versions have equal standing, and we will resolve any difference in the way that best protects you.