

# PRIVACY POLICY

Effective date: 01 August 2025

Last updated: 28 November 2025

This Privacy Policy explains how MEGACAMPUS EVENTS L.L.C. ("Company", "we", "us", "our") collects, uses, discloses, and protects personal data when you access or use the learning management system available at [lms.megacampus.com](https://lms.megacampus.com) and related services (the "Service").

By using the Service, you acknowledge that we process personal data as described in this Privacy Policy. Where required by law, we will obtain your consent (for example, for certain cookies or marketing communications).

## 1. Controller and contact details

Data controller: MEGACAMPUS EVENTS L.L.C.

Address: Office SM1-268, ARAB BANK Building, Port Saeed, Plot 184-0, Dubai, United Arab Emirates

Makani: 32005 94654

License No.: 1444340

Contact email (privacy requests): [info@megacampus.com](mailto:info@megacampus.com)

## 2. Scope

This Privacy Policy applies to personal data we process in connection with:

- account creation and use of the Service;
- subscriptions, trial periods, and billing administration;
- customer support and communications;
- analytics and security; and
- any other interactions with us through the Service.

This Policy does not cover third-party websites, services, or content that may be linked from the Service.

## 3. Personal data we collect

We collect personal data in the following categories (depending on how you use the Service):

### 3.1. Account and profile data

- first and last name;
- email address;
- phone number (if provided);
- username/login;
- password (stored in hashed form; we do not store passwords in plain text);
- account settings and preferences;
- campus/workspace name and subdomain identifier (if applicable).

### 3.2. Subscription and transaction data

- subscription plan, trial status, billing cycle, and renewal dates;
- payment status and invoice/receipt-related details (where applicable);
- limited payment metadata such as payment method type and the last digits of a card (if provided by the payment processor).

Important: Payment card numbers and full payment credentials are processed by third-party payment processors (anticipated: Stripe) and are not stored by us in full.

### **3.3. Service usage and device data**

- log data (IP address, timestamps, pages/features used);
- device and browser information;
- approximate location inferred from IP address (where permitted);
- identifiers and events for analytics/security (subject to your cookie preferences and applicable law).

### **3.4. User Content and communications (if enabled)**

- content you upload or submit through the Service (e.g., assignments, files, comments, messages);
- communications with instructors/mentors/admins if the Service enables such features;
- support requests and correspondence with us.

### **3.5. Cookies and similar technologies**

We collect information via cookies, SDKs, pixels, and similar technologies as described in our Cookie Policy.

## **4. How we use personal data (purposes)**

We use personal data for the following purposes:

### **4.1. Provide and operate the Service**

- create and administer accounts and campuses;
- provide access to features, content, and functionality;
- enable interaction features (if enabled);
- process requests and provide support.

### **4.2. Subscription administration and billing**

- manage free trials, subscriptions, auto-renewal, and payments;
- prevent fraud and manage billing disputes;
- issue receipts and service notifications related to billing.

### **4.3. Security, integrity, and prevention of misuse**

- detect and prevent unauthorized access, fraud, and abuse (including account sharing);
- monitor and protect the Service, systems, and users;
- investigate incidents and enforce our Terms of Use.

### **4.4. Analytics and improvement**

- understand how users interact with the Service;
- improve performance, usability, and features;
- develop new functionality.

### **4.5. Communications**

- send service-related messages (e.g., confirmations, security alerts, important updates);
- respond to inquiries and support requests.

#### **4.6. Legal and compliance**

- comply with applicable laws and lawful requests;
- protect our rights, property, and safety and those of our users.

#### **4.7. Marketing (where permitted)**

- send product news and offers (where permitted by law and subject to your preferences/consent);
- measure marketing effectiveness (where permitted and subject to cookie preferences).

### **5. Legal bases for processing (where applicable)**

Where laws require a legal basis (for example, for users in the EEA/UK), we rely on one or more of the following:

- Contract necessity: to provide the Service and administer subscriptions/trials and support.
- Legitimate interests: to secure and improve the Service, prevent fraud/misuse, and communicate about the Service (balanced against your rights).
- Consent: for certain cookies/technologies and certain marketing communications where required.
- Legal obligation: to comply with applicable laws, accounting, tax, or lawful requests.

### **6. How we share personal data**

We may share personal data with:

1. Service providers/processors that help us operate the Service (hosting, infrastructure, analytics, customer support tooling, email delivery, security).
2. Payment processors (anticipated: Stripe) to process payments, subscriptions, and fraud prevention.
3. Professional advisors (lawyers, auditors, accountants) when necessary.
4. Authorities and legal recipients when required by law or to protect rights and security.
5. Recipients in connection with a corporate transaction such as a merger, acquisition, reorganization, or sale of assets (subject to appropriate safeguards).

We do not sell personal data as a business model.

### **7. International data transfers**

Your personal data may be processed in countries other than your country of residence, including where our service providers operate and where our infrastructure is located.

Where required by law, we implement appropriate safeguards for international transfers (for example, contractual protections) and take reasonable steps to ensure an adequate level of protection.

### **8. Data retention**

We retain personal data only as long as necessary for the purposes described in this Privacy Policy, including:

- to provide the Service and maintain your account;
- to comply with legal, accounting, and tax obligations;
- to resolve disputes and enforce agreements; and
- to maintain security and prevent fraud.

Retention periods may vary depending on the type of data and applicable requirements.

## **9. Security**

We implement reasonable administrative, technical, and organizational measures designed to protect personal data against unauthorized access, loss, misuse, alteration, or destruction. However, no method of transmission or storage is 100% secure.

## **10. Your rights and choices**

Depending on your location, you may have rights such as:

- access to your personal data;
- correction/rectification;
- deletion/erasure;
- restriction of processing;
- objection to processing;
- portability; and
- withdrawal of consent (where processing is based on consent).

You can exercise privacy rights by contacting us at [info@megacampus.com](mailto:info@megacampus.com). We may need to verify your identity before fulfilling your request.

### **10.1. Marketing choices**

Where we send marketing emails, you may opt out by using the unsubscribe link or contacting us. Service-related messages (e.g., billing notices, security alerts) may still be sent.

### **10.2. Cookie choices**

You can manage cookie preferences through our cookie banner/preferences center and through browser settings. See the Cookie Policy.

## **11. Children**

The Service is not intended for individuals under 18. We do not knowingly collect personal data from children under 18.

## **12. Third-party links and services**

The Service may include links to third-party websites or services. We are not responsible for their privacy practices. Please review third-party privacy policies.

## **13. Changes to this Privacy Policy**

We may update this Privacy Policy from time to time. We will post the updated version on the Service and update the "Last updated" date. Changes take effect when posted unless otherwise stated.

#### **14. Contact**

If you have questions or requests regarding this Privacy Policy, contact us at [info@megacampus.com](mailto:info@megacampus.com).