

Privacy Policy

Bernadini Global Connections FZE

This Policy explains what personal data Bernadini Global Connections FZE collects, why, how long it is kept, and how users can control it. Fields in square brackets are to be completed before publication.

1. General provisions

1.1. The personal data controller is Bernadini Global Connections FZE, Sharjah Publishing City Free Zone, Emirate of Sharjah, UAE, licence No. 4431384.01, address: Business Centre, Sharjah Publishing City Free Zone, Sharjah, United Arab Emirates (the “Agency”, “we”).

1.2. This Policy applies to all data we receive through the website (the “Website”), messengers, email, telephone, questionnaires and in-person meetings.

1.3. We process data in accordance with UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (PDPL), the rules of the Sharjah Publishing City – Free Zone Authority and, for users from the EU and the United Kingdom, the GDPR and UK GDPR. For users from the Russian Federation, we take into account the requirements of Federal Law No. 152-FZ “On Personal Data” to the extent applicable to the Agency.

1.4. The service is intended only for persons over 18 years of age. If we learn that a questionnaire was completed by a minor, we delete their data.

1.5. By using the Website or providing data to us, the user confirms that they have read this Policy. Sensitive data is processed, and data is shared with Candidates, only on the basis of separate consent under the User Agreement on Personal Data Processing.

2. What data we collect and why

2.1. Categories of data:

Category	Examples	Source
Identification	Name, citizenship, country and city of residence	User
Contact	Phone, email, messengers, social media links	User
Profile	Education, occupation, marital status, children, height, appearance, habits, interests, languages, expectations of a partner	User, interview
Photo and video	Profile photos, video introductions	User
Sensitive	Religious beliefs, ethnic origin	User, with separate consent
Meeting information	Feedback after meetings, communication status	User, Candidates, manager
Payment	Payment method, amount	Payment provider
Technical	IP address, device type, browser, cookies, Website pages visited	Automatically

2.2. We do not receive or store bank card numbers.

2.3. Purposes and legal grounds:

Purpose	Legal ground
Registration, conclusion and performance of the public offer agreement	Performance of a contract

Purpose	Legal ground
Selecting Candidates and sharing profile information with them	User consent
Verifying identity and marital status for the safety of participants	Legitimate interest; consent
Taking sensitive data into account in matching	Explicit separate consent
Receiving payments, accounting and tax records	Legal obligation
Responding to enquiries, service notifications	Performance of a contract
Newsletters about events and offers	Consent, withdrawable at any time
Website analytics and service improvement	Cookie consent; legitimate interest
Protecting the Agency's rights in disputes	Legitimate interest

2.4. We do not make decisions with legal effects for the user solely by automated means. Candidates may be pre-screened using software tools, but the final decision on an Introduction is made by a manager.

2.5. We do not sell personal data or share it for third-party advertising.

3. Who we share data with

3.1. With Candidates — only the name, age, city, photos and profile information the user has approved for display. Contact details are shared only after both parties mutually agree to be introduced.

3.2. With public authorities — only upon a lawful request.

4. Retention and security

4.1. Retention periods:

Data	Period
Profile of an active client	Term of the Agreement plus [12] months after it ends
Inactive profile	12 months from last login, then deleted or anonymised
Payment and accounting records	[5] years as required by UAE law
Correspondence and requests	1 year
Cookies	As set out in section 5

4.2. When the period expires, or at the user's request, data is deleted or anonymised unless the law requires it to be kept.

4.3. Security measures: encrypted connection (HTTPS), role-based staff access, two-factor authentication in work systems, backups, and confidentiality obligations for staff and contractors.

4.4. In the event of a data breach likely to pose a risk to users, we notify the competent authority and affected users within the time limits set by law.

5. Cookies

5.1. The Website uses:

1. strictly necessary cookies — for the Personal Account and security; the Website cannot function without them;
2. analytics cookies — for visit statistics, only with consent;
3. marketing cookies — to measure advertising effectiveness, only with consent.

5.2. Consent is given and withdrawn via the cookie banner on the Website or in the browser settings.

6. User rights

6.1. The user has the right to:

1. obtain information about what data we process and a copy of that data;
2. correct inaccurate or outdated data;
3. request deletion of data that is no longer needed for its purposes or where consent has been withdrawn;
4. restrict or object to processing, including newsletters;
5. receive their data in a structured, machine-readable format to transfer to another controller;
6. withdraw consent at any time, without affecting the lawfulness of processing before withdrawal;
7. hide their profile from Candidates without deleting it.

6.2. Withdrawing consent to share data with Candidates makes matchmaking services impossible; in that case the Agreement terminates under the terms of the public offer.

7. Changes to this Policy

7.1. We may update this Policy. The new version is published on the Website with its effective date.