

Privacy Policy:

We, the STS Group (“STS”, "we" or "us"), maintain the information and materials on the STS Mobile Application (hereafter referred to as "STS App" Or "App") and ask you to take the time to read this Privacy Policy carefully. This Privacy Policy applies to visitors and users (individually, "you") of the App. (as defined below). We take your privacy seriously and understand the importance of trust. We have created this Privacy Policy, so you know how we collect, use, process or store any personal information you give us.

By using our STS App including signing up for any newsletters or feeds, you are agreeing to be bound by our Terms and Conditions, which include this Privacy Policy. By using the STS App to the extent permitted by applicable law you are consenting to us gathering and processing information about you in accordance with this Privacy Policy, although consent may not be required for all of the elements described in this Privacy Policy. For particular types of information or processing, we may provide you with choices or request your further consent related to what information we collect and how we may process it.

This Privacy Policy does not cover third parties or their services and we do not take any responsibility for how such third parties may use any information they collect. For information about third party privacy practices, please consult with them directly.

We will always aim to be respectful if you have given us consent to contact you. If at any time you don't feel we've lived up to this, please let us know straight away by contacting us via the contact section of the STS App. or through the contact details set out in the Contact Us section below.

Please take the time to read this Privacy Policy and note that it may change from time to time. You can always find an up-to-date version here on this page.

1. What information do we gather?

We may collect and process the following information in electronic and/or physical from you:

1.1. If you are interested in registering your child into our school bus services, the following information below may be collected from you.

1.1.1. Your and/or your child’s personal information such as names; title; postal address; email address; phone number; dates of birth; gender; occupation information; government issued ID information; visa information; religious beliefs; etc.;

- 1.1.2.Registration information, including for example information you have provided on your child's application forms and during the registration process, information on your child's educational background, and information from educational institutions attended previously;
- 1.1.3.Your child's health information and background such as immunization records; health issues; health restrictions; information on disabilities; any emotional, learning, physical and other health needs; etc.
- 1.1.4.information that you provide to us during the course of your child's transport with us;
- 1.1.5.marketing responses, such as child's current school, preferred curriculum, preferred location, preferred budget, preferred school;
- 1.1.6.survey responses, such as parent satisfaction score, net promoter score, service rating and feedback, etc;
- 1.1.7.information about your computer and/or device, including where available the IP address of your computer/proxy server that you use to access the internet, your web browser type, type of mobile device, and computer operating system, to analyse trends among our users and to help improve our STS App.

2. How do we gather this information?

The lawful bases we rely on for processing your information are:

- 2.1. We have a legitimate interest, except where processing is unfair to you. STS relies on legitimate interests for most of the way in which it uses your information. STS has a legitimate interest in: providing transport services to children; ensuring a safe and secure school bus environment; safeguarding and promoting the welfare of all staff and children; protecting and promoting the objects and interest of STS; facilitating the efficient operation of STS; ensuring our compliance with employment obligations; and ensuring all relevant legal obligations are complied with.
- 2.2. We have a contractual obligation. We will need to use your information in order to perform any existing obligations under a contract with you.
- 2.3. We have a legal obligation. We may need to use your information in order to comply with a legal obligation, for example to fulfil our safeguarding duties to staff and students.
- 2.4. We have a vital interest, for example preventing someone from being seriously harmed.

- 2.5. We have a public interest. STS considers that it is acting in the public interest when providing transport services to students and employment opportunities to individuals.
- 2.6. The lawful bases we rely on for processing special categories of personal information are the below, where we are required to comply with additional conditions to process such information (including, information concerning racial or ethnic origin, communal origin, political affiliations or opinions, religious or philosophical beliefs, criminal record, trade-union membership and health or sex life, and including genetic data and biometric data where it is used for the purpose of uniquely identifying a person):
- 2.7. To protect the vital interests of any person, where for example that person cannot give consent or in order to prevent someone from being seriously harmed or killed.
- 2.8. The processing of this information is necessary for the establishment, exercise or defense of legal claims. This allows us to share information with our legal advisors and insurers.
- 2.9. For the purposes of medical treatment and management of healthcare services.
- 2.10. We have your consent. You are entitled to request that we stop any consent-based processing of your personal information after you withdraw that consent. You can do this by contacting us at the relevant contact details in the STS Group section of the App.

As mentioned above, in some cases we will rely on more than one of the grounds above for a particular use of your information. The grounds that we will rely on for a particular purpose may vary depending on the circumstances.

You directly provide us with most of the information that we collect, whether in digital or non-digital formats. We collect information and process information through the following ways:

- 2.11. Information that you provide by filling in forms electronically on our App or in physical form in person, including, without limitation, information provided at the time of registering, subscribing to a service, registering your child for school bus service, entering into a contract with us, posting material on our App or requesting further information or services from us.
- 2.12. We may also ask you for your information if you report a problem with the STS App.
- 2.13. If you contact us, we may keep a record of that correspondence and the information within it.

- 2.14. We may also ask you to complete surveys that we use for research purposes, although you are not obligated to respond to them.
- 2.15. If you carry out any transactions through the STS App or otherwise and through the fulfillment of your orders and requests.
- 2.16. If you want to sign up to receive our newsletter or any feeds.

3. How we use the information?

We use the information held about you in the following ways and for the following purposes:

- 3.1. To register and respond to your application and queries.
- 3.2. To provide you with the services and functionality offered through the STS App and to fulfil your requests, including, but not limited, to communicating with you about your enquiry or use of the STS App, services or functionality.
- 3.3. To respond to, or follow up on, your comments and questions, and otherwise provide customer service.
- 3.4. To operate and improve the services, and functionality and tailor your experience on the STS App including search results and displaying relevant promotions.
- 3.5. To ensure that the content is presented in the most effective manner for you and for your device.
- 3.6. To provide you with information, products or services that you request from us or which we feel may interest you or where you have consented to be contacted for such purposes.
- 3.7. To send you relevant news if you have signed up to receive it.
- 3.8. To occasionally carry out surveys to ensure that we are providing you with what you are interested in.
 - 3.8.1. To perform statistical analysis.
 - 3.8.2. To comply with our policies, procedures and legal obligations.
 - 3.8.3. To protect, investigate and deter against fraudulent, unauthorised, or illegal activity, including as we feel is necessary to protect our interest.

- 3.8.4. To carry out our obligations arising from any contracts entered into between you and us.
- 3.8.5. To allow you to participate in any interactive features of the App when you choose to do so.
- 3.8.6. To promoting the objectives and interests of STS, including fundraising and marketing.
- 3.8.7. To check whether you are eligible for a competition and to contact you if you win.
- 3.8.8. To notify you about changes to our services.
- 3.8.9. As otherwise consented by you and as otherwise permitted by applicable law.

4. Will we share your information with anyone else?

4.1. Yes if:

- 4.1.1. You specifically request this, such as when you submit information to enquire about enrollment for your child for transport services.
- 4.1.2. We are required to do so to comply with our internal policies and procedures or the law, or with direction from the courts or other authorities.
- 4.1.3. We feel it is reasonably necessary to prevent illegal activity or to protect our interests, such as when someone has breached Paragraph 2 of the Terms and Conditions (Use of the STS App and User Code of Conduct.)
- 4.1.4. We appoint consultants, experts and other advisors to assist STS in fulfilling its obligations and need to share your information with them if it is relevant to their work.
- 4.1.5. It helps our trusted third party service providers to provide and improve our service to you or to carry out surveys and user analysis to understand your needs and preferences. We will also share your information with mass mail service provider, who securely hosts emails and acts as a supplier to distribute our newsletters. We require these service providers to keep your personal information safe and secure. These trusted third parties would only be permitted to use your personal information for the purposes we specify.

4.2. We may also share your information with other STS group companies and affiliates.

4.3. We won't rent or sell your details to any other organisation or individual. We may share some broader statistics and customer profiling information with third parties, but we'll keep it anonymous, so you won't be identifiable from that data.

5. Where we store and process the information?

5.1. The information we collect from you is partly stored on servers in the UAE. Your data may be transferred, stored and processed in countries which do not have data privacy laws as strong as those in the UAE, and may also be processed by people operating outside the UAE who work for us or one of our suppliers. By submitting the information, you acknowledge and agree to this transfer, storing or processing across national borders and entities as needed to provide you with the service you have asked from us. We will take commercially reasonable steps necessary to ensure that the information is treated securely and in accordance with this Privacy Policy.

5.2. We will retain your information for the period necessary to fulfil the purposes outlined in this Privacy Policy and as otherwise needed to comply with applicable law and internal company policies.

6. Security

6.1.1. We understand the importance of securing your personal information in our care. We utilise reasonable security measures that include technical, administrative and physical safeguards to secure your personal information in our care from unauthorised access, modification, disclosure or destruction.

6.1.2. However, if you provide us with personal information over the internet, you should be aware that the absolute security of the information transmitted over the internet or stored in electronic storage cannot be guaranteed to be 100% secure. While we take reasonable efforts to protect such personal information, you acknowledge that we cannot ensure or warrant the security of any personal information provided by these means and you provide it to us at your own risk.

7. Password and Confidentiality

7.1. If you are provided with a user identification code, password or any other piece of information as part of our security procedures, you are responsible for maintaining the confidentiality of your password and username for the service and you are responsible for all activities that are carried out under them. We do not have the means to check

the identities of people using the STS App and we will not be liable where your password or username is used by someone else.

- 7.2. You agree to contact us immediately and inform us of any unauthorised use of your password or username of which you become aware. We have the right to disable any user identification code or password, whether chosen by you or allocated by us, at any time, if in our opinion, you have failed to comply with any of the provisions of this Privacy Policy or the Terms and Conditions.

8. Your data protection rights

- 8.1. You have the right to ask us for copies of your information, which is free of charge in most cases.
- 8.2. You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- 8.3. You have the right to ask us to erase your information in certain circumstances.
- 8.4. You have the right to object to the processing of your information in certain circumstances.
- 8.5. You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.
- 8.6. We may request proof of your identity before we disclose such information to you so as to prevent unauthorised access.

Write to us at the contact details provided in the STS Group section of the App.

9. Consent

- 9.1. By submitting information to us, you consent to our collection, storing and processing of your information in accordance with this Privacy Policy. You are entitled to request that we stop any consent-based processing of your personal information after you withdraw that consent. Please contact us at the relevant contact details in the STS Group section of the App.
- 9.2. You are entitled to ask us not to process your personal information for marketing purposes. Please contact us at the relevant contact details in the STS Group section of the App.
- 9.3. Protecting personal information and online privacy of minors is especially important to us. To find out more, please read our Terms and Conditions document.

10. Information you share socially

10.1. The STS App may allow you to connect and share your actions, comments, content, and information publicly or with friends. The STS App may also allow you to connect with us on, share on, and use third party platforms, including those on which STS has a presence. Please be mindful of your personal privacy needs and the privacy needs of others as you choose whom to connect with and what to share and make public. We cannot control the privacy or security of information you choose to make public or share with others. STS also does not control the privacy practices of third party platforms. Please contact those websites and services directly to learn about their privacy practices.

11. Are you protected by this policy on other websites that are not ours?

11.1. Our STS App contains links to other third party websites and platforms. We do not have any control over them and take no responsibility for any information you give them. Other third party websites and platforms have different privacy and security policies, which we advise you to read. Please contact those websites and services directly to learn about their privacy practices.

12. Contact Us

12.1 .If you have any queries, comments or complaints regarding the STS App or this Privacy Policy, please talk to us. You can contact us via the STS Group section of the App or write to us at:

STS Group

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