

OFFICIAL ENGLISH LEGAL VERSION

# Sabi Privacy Policy - UK GDPR

Data protection information for Sabi users, website visitors, partners, applicants, contractors and representatives.

Company	SABI AI TECHNOLOGIES LIMITED
Registered office	128 City Road, London, England, EC1V 2NX, United Kingdom
Domain	sabiai.app
Effective date	21 June 2026

This English document is the official legal version. Russian translation is provided for user convenience. If there is any inconsistency, the English version prevails to the maximum extent permitted by applicable law. This document is a privacy policy template and should be reviewed by a qualified UK data protection lawyer before production launch.

## 1. Controller and scope

SABI AI TECHNOLOGIES LIMITED is the controller for personal data processed through its official public website, Sabi AI, Sabi Messenger and other Sabi-operated services, unless a specific product notice states otherwise.

Registered office: 128 City Road, London, England, EC1V 2NX, United Kingdom. Contact: [legal@sabiai.app](mailto:legal@sabiai.app).  
Official domain: <https://sabiai.app>.

This Privacy Policy applies to users, website visitors, partners, contractors, project applicants, representatives, support contacts and other persons whose data is processed by Sabi.

## 2. Personal data we may process

- identity and contact data: name, email, phone number, account identifiers, company/partner details and communication preferences;
- account and service data: profile information, application data, taxi/service requests, support tickets, Sabi Messenger records and user-generated content;
- technical and security data: IP addresses, device identifiers, browser data, session logs, access logs, fraud markers, Sabi AI risk indicators and audit records;
- payment and provider data: invoice data, payment references, receipts, TxHash/payment number, transaction markers and provider verification results where applicable;
- evidence and compliance data: documents, photos, video, application records, due diligence materials, KYC/KYB indicators and internal review records where required for a lawful purpose.

## 3. Purposes and lawful bases

Sabi processes personal data to provide services, create accounts, verify requests, communicate with users, handle support, maintain security, prevent fraud, comply with legal obligations, protect users and improve platform integrity.

Depending on context, the lawful basis may include contract necessity, legal obligation, legitimate interests, consent where required, or vital/public interest grounds where applicable under UK data protection law.

Legitimate interests include platform security, fraud prevention, abuse prevention, evidence preservation, service reliability, internal audit, dispute handling, legal claims and responsible product operation.

## **4. No sale or third-party marketing use**

Sabi does not sell user personal data.

Sabi does not transfer user personal data to third parties for their independent marketing purposes.

Sabi does not use user personal data for third-party marketing. Any optional Sabi marketing communication, if enabled later, must follow applicable consent/opt-out rules.

## **5. Sabi AI monitoring and automated analysis**

Sabi AI may analyse service activity, logs, transactions, payment markers, documents, messages, risk indicators and operational signals to detect fraud, money laundering, corruption, crime, abuse, safety risks, policy breaches and service integrity issues.

Sabi AI may flag, score or prioritise risk. Where a final decision has a material legal, financial or account effect and human review is required, Sabi will use human review before final action to the extent required by law or company policy.

Users may contact Sabi about a significant automated decision where applicable legal rights arise.

## **6. Sharing with law enforcement and competent authorities**

Where signs of fraud, money laundering, terrorist financing, corruption, bribery, sanctions evasion or any criminal activity are detected, Sabi may preserve and disclose relevant information in accordance with applicable law.

Recipients may include the National Crime Agency (NCA), UK Police, courts, regulators or other competent law-enforcement authorities. Disclosures must have a lawful basis and should be necessary and proportionate.

Sabi may submit or support reports, requests or disclosures where required or permitted under applicable law, including POCA-related suspicious activity reporting, court orders, police requests, regulator requests or other lawful duties.

## **7. External providers and processors**

Sabi may use external providers for hosting, cloud infrastructure, security, identity verification, analytics, payments, payouts, cryptoasset-related provider flows, communications, customer support, legal/compliance services and other operational needs.

Where an external provider operates its own regulated service, that provider may be an independent controller for its own service and will process data under its own terms, privacy notice, licences, KYC/AML duties and regulatory obligations.

Sabi will require appropriate safeguards from processors where required by UK GDPR and applicable data protection law.

## **8. International transfers**

If personal data is transferred outside the United Kingdom, Sabi will use an appropriate transfer mechanism where required, such as adequacy regulations, the UK International Data Transfer Agreement,

the UK Addendum to EU Standard Contractual Clauses or another lawful safeguard.

## 9. Retention

Sabi keeps personal data only for as long as reasonably necessary for the purposes described in this policy, including service delivery, legal compliance, audit, dispute handling, fraud prevention, AML/compliance review, evidence preservation and legal claims.

Retention periods may vary depending on the type of data, product, legal obligation, investigation status, provider requirements and the need to preserve admissible evidence.

## 10. User rights

Subject to legal conditions and exemptions, users may have rights to access, rectification, erasure, restriction, objection, data portability and rights related to automated decision-making.

Users may contact [legal@sabiai.app](mailto:legal@sabiai.app) to exercise rights. Sabi may need to verify identity before responding.

Users may also have the right to complain to the UK Information Commissioner's Office (ICO).

## 11. Security, children and updates

Sabi applies technical and organisational measures intended to protect personal data, including access controls, logging, evidence preservation controls, security monitoring and internal review procedures.

Sabi services are not intended for children unless a specific product legally supports child use with appropriate safeguards.

Sabi may update this Privacy Policy. The latest version published on the official website applies from its effective date.

## 12. Contact

Privacy and legal contact: [legal@sabiai.app](mailto:legal@sabiai.app). Support: [support@sabiai.app](mailto:support@sabiai.app). Official website: <https://sabiai.app>.