

FIEN CONSULTING PRIVACY NOTICE

August 2026

This notice explains how Fien Consulting Limited (“FCL”, “we”, “us” or “our”) processes personal data in connection with our website, our enquiry process, and the delivery of our services (the “Services”).

Fien Consulting FZ LLC is registered in United Arab Emirates with trading licence 45037131, and registered address at: FDBC6291, Compass Building, Al Shohada Road, Al Hamra Industrial Zone-FZ, Ras Al Khaimah, UAE.

This notice covers personal data relating to individuals connected with our prospective and current clients, suppliers and partners. It does not extend to the technical or financial data present in any spreadsheet constructed using the FienX Toolkit add-in, since this will be governed separately by the consensus between client and FCL, when client decides to share such spreadsheets with FCL for any reason.

We may update this notice from time to time. When we do, we will revise the date above.

1. Who is responsible for your personal data, and how to contact us

FCL is the controller of personal data described in this notice. Questions about this notice, or about our processing of your personal data, can be directed to:

Email	gjfien@fienconsulting.com
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2. What personal data we process

Personal data means information relating to an identified or identifiable individual. We process the following, depending on your relationship with us:

- identification data as provided during the licence purchasing process: name, telephone number, physical address, email address, and payment method – i.e. no bank details, card numbers, etc.;
- transfer count – the number of activations done with your licence.

FCL does not collect financial, bank account, identification document, or other sensitive personal data. Where this is volunteered to us, we process it only for the purpose for which it was given.

3. Purposes and legal bases

We process personal data on the following bases:

- Licence issuance - to provide and administer access to the FienX Toolkit.
- Software support - to respond to enquiries and manage our relationship with the organisation you represent.
- Legal and regulatory obligation - to carry out regulatory checks, and respond to valid requests from courts, regulators or other competent authorities.
- Legitimate interest - to share relevant business updates, subject to your right to object.
- Consent - where we ask for it, such as in connection with an enquiry; you may withdraw consent at any time.

Where personal data is required to provide access or to comply with a legal obligation, failure to provide it may mean we cannot proceed with the relevant Service.

4. Automated decision-making

We do not carry out automated decision-making or profiling that produces legal or similarly significant effects. We do not use cookies, analytics tags or similar tracking technologies on our website or in our software.

5. Sources of personal data

We collect personal data directly from our license holders only, or from those acting demonstrably on their behalf.

6. Sharing personal data

We do not sell personal data.

We will only disclose personal data to regulators, courts or other authorities, where and when required by law.

7. Retention

We retain minimal personal data for as long as your FienX Toolkit licence remains active.

8. Security, minors and third-party links

We maintain technical and organisational measures to protect personal data and require staff and third parties processing data on our behalf to keep this confidential.

We do not knowingly collect personal data from anyone under 16.

9. Your rights

Subject to applicable law, you may request access to, correction of, or erasure of your personal data; request that we restrict our processing; and withdraw consent where applicable. To exercise these rights, contact us at privacy@cornspring.ai. We will respond as required by applicable law.

As we are incorporated in the Ras Al Khaimah Free Zone, FCL follows the UAE's federal data privacy framework—primarily UAE Federal Decree-Law No. 45 of 2021 on the Personal Data Protection Law (PDPL).