iMobile

MoneyCounter

Country Annex — United Arab Emirates and Saudi Arabia

Vendor statement of facts relevant to local requirements

Document ID	IM.MONEYCOUNTER.AE-SA.A1
Document version	1.0
Date of issue	2026-10-06
Applies to	MoneyCounter 2.0.0.0
Language	English
Publisher	iMobile

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About this document

This annex supplements the documentation of MoneyCounter version 2.0.0.0 for customers in the United Arab Emirates and the Kingdom of Saudi Arabia. It sets out the facts about the product that matter under the local rules named below and shows which obligations stay with the customer.

The annex is a statement by the vendor about its product. It is not legal advice, not a certificate of conformity and not a substitute for the customer's own assessment.

1. Purpose and status

No certification, licence or registration by authorities of the United Arab Emirates or of the Kingdom of Saudi Arabia is claimed for the product or for the vendor in this document.

2. Product facts

Item	Fact
Product and version	MoneyCounter 2.0.0.0
Deployment	Desktop software installed on the customer's computers
Customer content on vendor servers	No
Interface languages	16 languages: English, Russian, German, Spanish, Chinese, Japanese, Korean, Arabic, Turkish, Persian, Portuguese (Brazil), French, Italian, Polish, Vietnamese, Indonesian. The installer is in English only.

2.1. Personal data the product can process

- The e-mail address entered to activate the Pro edition: kept on the computer in an encrypted file and sent to the vendor's account server. Not requested without activation.
- A machine fingerprint (SHA-256 hash of the Windows MachineGuid, the computer name and the system volume serial number): sent to the account server after activation and tied to the e-mail address in the signed terms string.
- Free-text comments to counts typed by the user: kept only in the local database.

2.2. Where data is stored

All data stays on the user's computer, in the Windows user profile: the database `%APPDATA%\MoneyCounter\moneycounter.ste` (SQLite: currencies, denominations, history of counts with logs), the activation file `%APPDATA%\MoneyCounter\license.dat`, and settings in the registry key `HKCU\Software\MoneyCounter` (language, selected currency, history column layout). No count data is stored on vendor servers.

2.3. Data sent to the vendor

- Activation code request: e-mail address, product identifier, interface language code (HTTPS, account server `accounts.new-imobile.com`)
- Activation: e-mail address, code from the e-mail, product identifier
- Edition check — right after activation and in the background on every start of an activated program: activation token, product identifier, machine fingerprint

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- Nothing else: no counts, history, telemetry or error reports are sent and there is no update check; a program that has not been activated opens no network connections

3. Data protection

The following laws apply to the personal data the customer processes with the product:

- United Arab Emirates — Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data; in the financial free zones, the DIFC Data Protection Law No. 5 of 2020 and the ADGM Data Protection Regulations 2021;
- Kingdom of Saudi Arabia — the Personal Data Protection Law (Royal Decree M/19 of 2021, as amended by Royal Decree M/148 of 2023) and its Implementing Regulation, supervised by the Saudi Data and AI Authority (SDAIA).

3.1. Roles

For personal data processed in the product on the customer's own equipment, the customer is the controller. The vendor has no access to that data and is not a processor for it.

For the data listed under "Data sent to the vendor", which the vendor receives in order to perform the licence agreement, the vendor is itself a controller.

3.2. What the product provides

- **Access control.** The program has no sign-in, roles or access control of its own. Access to data is determined by the Windows account: each Windows user has a separate database and activation. The Pro edition is confirmed by an e-mail address and a one-time code sent to it.
- **Logging.** The program keeps no security event log, operation log or diagnostic files. Each saved count is stored with its log: lines about quantity changes, clearing and saving with the breakdown by denomination. The user can delete history records; deletions are not recorded.
- **Export and deletion.** Export: File → Back up… saves a copy of the database — a SQLite file readable with standard tools; there is no export to CSV, Excel or PDF and no printing. Deletion: a single history record with the M- button; all user data by deleting the folder `%APPDATA%\MoneyCounter` and the registry key `HKCU\Software\MoneyCounter` (uninstalling the program does not remove them). Activation data on the account server cannot be deleted from the program — contact iMobile for that.
- **Encryption.** See the section on cryptography below.

3.3. What remains with the customer

- the legal basis for processing, including consent where the law requires it, and notices to data subjects;
- answering data-subject requests with the export and deletion functions above;
- breach notification to the competent authority;
- data-residency requirements: for installations on the customer's equipment, the customer chooses where that equipment is located, including in-country hosting where a sector regulator requires it.

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4. Cybersecurity requirements

Government bodies and operators of critical infrastructure apply the National Cybersecurity Authority's Essential Cybersecurity Controls in Saudi Arabia and the information-assurance standards of the national authorities in the United Arab Emirates, and pass them on to suppliers. The facts needed for such an assessment are in the Security and Data Protection Statement. No assessment of the product against these controls is claimed.

5. Accessibility

Government buyers in both countries refer to WCAG for digital services.

Status of the product: No accessibility evaluation has been carried out; operation with screen readers and in high-contrast mode has not been tested. The display and some buttons are non-standard, custom-drawn controls. For Arabic and Persian the main window keeps a left-to-right layout.

No accessibility conformance report is provided for this version.

6. Language

This package is supplied in English. Government contracts, and in Saudi Arabia invoices and consumer-facing documents, are required in Arabic. Arabic-language documentation is not part of this package.

Interface languages of the product: 16 languages: English, Russian, German, Spanish, Chinese, Japanese, Korean, Arabic, Turkish, Persian, Portuguese (Brazil), French, Italian, Polish, Vietnamese, Indonesian. The installer is in English only.

7. Documents usually requested and where to find them

Usually requested	Where it is
Product description, functional specification	Product Description and Functional Specification
Installation and operating instructions	Installation and Administration Guide
User manual	User Guide
Maintenance and support description	Software Lifecycle, Maintenance and Support. Service levels: contract
List of third-party and open-source components	Delivery Specification and Third-Party Components
Security and data-protection description	Security and Data Protection Statement
Data processing and cross-border transfer terms	Contract; needed only where the vendor processes customer data
Documentation in Arabic	Not part of this package
Licence agreement, warranties, prices	Contract

Document history

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Document version	Date	Product version	Change
1.0	2026-10-06	2.0.0.0	First issue

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