



Alif Technology LLC
GLOBAL PRIVACY NOTICE

Version #1

Effective from 01/07/2025



PRIVACY NOTICE

1. PRELIMINARY

- 1.1. Your privacy is very important to us. We are committed to the protection of your Personal Data. This global privacy notice ("**Global Privacy Notice**" or "**Privacy Notice**") is shared by Alif Technology LLC (**Company, we, us, our**) incorporated under the Dubai Department of Economy and Tourism, Dubai, United Arab Emirates (**UAE**) and bearing license number 1048490 with you to inform you about the way we process, store, and share your Personal Data (*as defined below in section 1.2 of this Privacy Notice*). Since this is a Global Privacy Notice, the Company may also refer to a group entity of Alif Technology LLC that is responsible for the collection and use of your Personal Data (also referred to as a data controller), which is usually the entity that originally obtains your Personal Data. For a list of data controllers and contact details by country, please write to us at info@alifx.ae.
- 1.2. This Privacy Notice explains our Personal Data collection, processing, usage, storage, deletion and related practices. It also lays down the purposes for which, and lawful bases under which we process your Personal Data. Further, it also describes your choices and statutory rights regarding the use, access, and correction of your Personal Data. Subject to more broad definitions contained in the local Personal Data protection laws and regulations of the country in which your Personal Data is originally collected, Personal Data means any data or information relating to you which may, by itself, or in combination with other data or information, be able to identify you (**Personal Data**).
- 1.3. It is important that you read this Privacy Notice together with any other Personal Data processing notice we provide on specific occasions when we are collecting or processing Personal Data about you so that you are fully aware of how and why we are using your Personal Data. By visiting, accessing, integrating with, showcasing your services on, or using the Platform, you the Customer (*as defined in section 5.1 of this Privacy Notice below*) consent to this Privacy Notice and to the data processing purposes and practices stated in it. The '**Platform**' collectively refers to the Partners App (*as defined in section 5*), Website (*as defined in section 5*) and our mobile based application (**Mobile App**), available at the [Google Play](#) Store and [App Store](#) and any supporting servers, software, or third-party integrations used to deliver our services, and is to be read as required by the relevant section of this Privacy Notice.



- 1.4. If you do not agree with the data processing purposes and practices stated in this Privacy Notice, you may choose to stop using the Platform, including listing your services on it, where applicable. We periodically update this Privacy Notice, and we encourage you to review it periodically. Unless specified otherwise, any changes to this Privacy Notice shall be effective as and when they are published on the Platform.

2. IMPORTANT INFORMATION

- 2.1. This Privacy Notice is reviewed annually unless there is a change in the applicable laws.. The Company's Chief Technology Officer (**CTO**) is responsible for the maintenance and enforcement of this Privacy Notice. The CTO is responsible for Personal Data management and protection and for maintaining policies, procedures, systems, and controls to protect your Personal Data and information against any misuse, unauthorized access and undue processing and analysis.
- 2.2. The board of directors of the Company is the approving body for the Privacy Notice. Upon establishing that an update is required, the CTO proposes changes by presenting them to the board of directors. Once the board of directors' approval is obtained, the approved changes are incorporated in the Privacy Notice.

3. PURPOSE AND LAWFUL BASIS

- 3.1. This Privacy Notice has been developed for purposes of compliance with applicable Personal Data protection laws, regulations, circulars and notices which apply to the Company, as published by a relevant authority from time to time.
- 3.2. Without the necessary information about you, we may not be able to provide the Platform, or support you with your requests, and may not be able to provide services to you. Some of the Personal Data we obtain is collected to comply with applicable laws and regulations, including anti-money laundering laws. This Privacy Notice explains:
 - i. The types of Personal Data we collect;
 - ii. How we use your Personal Data;
 - iii. Types of information we disclose to third parties and the types of such third parties;
 - iv. How we transfer your Personal Data; and
 - v. How and when we protect your Personal Data.



- 3.3. We may rely on your consent to process your Personal Data, where applicable. However, we may also process your Personal Data (whether provided directly by you, whether collected by us, or received by us from third parties or otherwise) to satisfy any legal obligations arising from any contracts entered into/ with/ involving you or to provide the Platform to you which you have contracted with us to provide to you; or to take steps at your request prior to entering into a contract with you. Further, where applicable, we may rely on one or multiple of the legal bases listed in the applicable laws and regulations of the country in which your Personal Data is originally collected to process your Personal Data without your consent.
- 3.4. By applying, signing up on, or integrating with our Platform, you authorize and consent to our obtaining from, and disclosing to, third parties any Personal Data about you as stated in this Policy. Such Personal Data processing, sharing, transfers may be in connection with identity or account verification, fraud detection, or collection procedure, or as may otherwise be allowed or required by applicable law.
- 3.5. Where consent is the lawful basis we have relied on to process your Personal Data, you can withdraw your consent as regards the processing of your Personal Data. Such withdrawal will not affect the lawfulness of earlier processing undertaken by us insofar it was in compliance with this Privacy Notice. Such withdrawal will take effect within 30 (thirty) calendar days of submission of request. If you wish to submit such a request, please contact us at s.abdulkhamidov@alifx.ae.
- 3.6. The specific Personal Data we collect, the method by which we collect such data, the purposes for which we collect such data, how we share such information, and how long we retain such data is explained individually, specifically for your clear, simple, and withdrawable consent below in section 6 this Policy.

4. PERSONAL DATA PROTECTION PRINCIPLES

- 4.1. Your Personal Data is processed in accordance with the relevant data protection principles, including lawfulness, fairness, and transparency; purpose limitation; collection limitation; data minimization; accuracy; rectification measures; storage limitation; integrity and confidentiality (security); and with due consideration to the applicable laws and regulations.

5. INDIVIDUALS FROM WHOM WE COLLECT PERSONAL DATA



5.1. A Customer is a natural person whose Personal Data we process as a data controller, which would typically be (i) the visitors of our website at www.alifx.ae (our **Website**); (ii) representatives of merchants onboarded by us as sellers/merchants (**Merchants**) and who have access to the partners app (**Partners App**); (iii) individuals who are onboarded as users (**Users**) on the Mobile App or our Website to avail of our various services; and (iv) representatives of third party service providers who interact with us to fulfil their contractual obligations with us. Collectively, persons listed at (i) to (iv) above shall be referred to as “**Customers.**”

6. PERSONAL DATA WE PROCESS, LAWFUL BASIS, PURPOSE, AND MODES OF COLLECTION

6.1. We process different types of Personal Data, which we set out in the table below together with the lawful basis for our use of your information and the source of such information:



| Customer type | Information we process | Purpose / activity | Lawful basis | Mode of Collection |
|---|---|---|--|---|
| <ul style="list-style-type: none"> ▪ Users ▪ Merchant representatives ▪ Representatives of third-party service providers | Personal Identifiers/Details <ul style="list-style-type: none"> ▪ Identity data: includes first name, last name, username, ID document number. ▪ Contact data: includes, contact details billing address, delivery address, email address and telephone numbers. ▪ Profile data: includes the username and password used by our Customer or Customer's representatives when they log in to the Platform. | <ul style="list-style-type: none"> ▪ Register on our Platform. ▪ Fulfil any requests you make (e.g., submitting a query on the Platform, subscribing to a communications service, fulfilling requests for information, entering into a competition, promotion, survey etc.). ▪ Allow you to participate in any interactive features of our Platform when you choose to do so. ▪ Providing services. | <ul style="list-style-type: none"> ▪ Your consent. ▪ Performance of a contract with you. ▪ If the processing is for Personal Data that has become available and known to the public by you. ▪ Necessary to comply with a legal obligation. | <ul style="list-style-type: none"> ▪ Our registration, enquiry or contact forms, our direct interactions with you, or our email correspondence with you. |
| <ul style="list-style-type: none"> ▪ Users ▪ Merchant representatives | Sensitive Personal Data <ul style="list-style-type: none"> ▪ Religious beliefs; | <ul style="list-style-type: none"> ▪ Religious beliefs may be reflected in names, and | <ul style="list-style-type: none"> ▪ Your consent. | <ul style="list-style-type: none"> ▪ Our registration, enquiry or contact forms, our |



| Customer type | Information we process | Purpose / activity | Lawful basis | Mode of Collection |
|--|---|---|---|---|
| <ul style="list-style-type: none"> Representatives of third-party service providers | <ul style="list-style-type: none"> Biometric data; and Criminal records. | <ul style="list-style-type: none"> titles and are collected as part of the onboarding, and due diligence process for our Customers. We may also collect information about criminal convictions and offences but only in the context of fraud or security checks when this is necessary to comply with applicable laws or with any applicable financial services standards or requirements. Providing Services. Compliance with law. | <ul style="list-style-type: none"> Performance of a contract with you. Necessary to comply with a legal obligation. If the processing is for Personal Data that has become available and known to the public by you. | <ul style="list-style-type: none"> direct interactions with you, or our email correspondence with you. |
| <ul style="list-style-type: none"> Merchant representatives Representatives of third-party | Legal Proceedings Data Details of legal proceedings, details of criminal convictions or | <ul style="list-style-type: none"> In order to ensure that our supply arrangements are | <ul style="list-style-type: none"> Your consent. Performance of a contract with you. | <ul style="list-style-type: none"> The organisation you work for. |



| Customer type | Information we process | Purpose / activity | Lawful basis | Mode of Collection |
|---|---|---|--|---|
| service providers | related to judicial or security procedures. | put in place in a manner that complies with the law. | <ul style="list-style-type: none"> Necessary to comply with a legal obligation. If the processing is for Personal Data that has become available and known to the public by you. | <ul style="list-style-type: none"> Our registration, enquiry or contact forms. Public registers and records. Third party providers of databases containing relevant information. |
| <ul style="list-style-type: none"> Visitors Users Merchant representatives | Marketing Data Includes your name, position and business details and includes your preferences in receiving marketing from us and our third parties and your communication preferences. | <ul style="list-style-type: none"> Promote and market our company Platform. Provide you with personal offers tailored to your needs and customising what we show you to your preferences. Distribute information, newsletters, publications, and other communication | <ul style="list-style-type: none"> Your consent. Performance of our contract with you. | <ul style="list-style-type: none"> Our registration, enquiry or contact forms, our direct interactions with you, or our email correspondence with you. |



| Customer type | Information we process | Purpose / activity | Lawful basis | Mode of Collection |
|---|---|--|--|--|
| | | via various mediums to keep you informed. | | |
| <ul style="list-style-type: none"> Users Merchant representatives | Feedback and opinions | <ul style="list-style-type: none"> Allow us to answer queries and complaints you may have. Help us evaluate the quality and consistency of our Platform. Research and develop new product offerings on the Platform | <ul style="list-style-type: none"> Your consent. Performance of our contract with you. | <ul style="list-style-type: none"> Our enquiry or contact forms, and our correspondence with you. |
| <ul style="list-style-type: none"> Visitors Users Merchant representatives Representatives of third-party service providers | Technical Data Includes your internet protocol (IP) address, your login data, internet browser and device type, time zone setting, location data and your use of our Platform, including which pages you visited, how you got to our Platform, the time and length of | Enables us to: <ul style="list-style-type: none"> provide you services; monitor the performance and relevance of our Platform and our ad words campaigns; | <ul style="list-style-type: none"> Your consent. Performance of our contract with you. | <ul style="list-style-type: none"> As you interact with our Platform, we will automatically collect Platform communication and usage data about your equipment, browsing actions and patterns. We collect this personal data through the operation of |



| Customer type | Information we process | Purpose / activity | Lawful basis | Mode of Collection |
|---|--|---|---|---|
| | your visit and your language preferences. | <ul style="list-style-type: none"> ensure that content from our Platform is presented in the most effective manner for you and for your computer; tailor the content of our Platform for you; and keep our Platform, our other IT systems, and facilities safe and secure. | | <p>your browser on your device, by using cookies and other similar technologies. Please see our cookie policy as provided in section 10 for more information.</p> <ul style="list-style-type: none"> Third party analytics providers such as Google Analytics. |
| <ul style="list-style-type: none"> Users Merchant representatives Representatives of third-party service providers | Email Interaction <ul style="list-style-type: none"> The number of times you open each email we have sent you, whether they have been delivered to you, and which sections you clicked on. | <ul style="list-style-type: none"> Fulfil any requests you make (e.g., submitting a query on our Platform, subscribing to a communications service, fulfilling requests for information, entering into a competition, promotion, survey etc.). | <ul style="list-style-type: none"> Your consent Performance of our contract with you. | <ul style="list-style-type: none"> Our correspondence with you. |



| Customer type | Information we process | Purpose / activity | Lawful basis | Mode of Collection |
|---|--|--|---|---|
| | <ul style="list-style-type: none"> Information contained within our correspondence with you. | <ul style="list-style-type: none"> Measure the effectiveness of our email correspondence with you, including marketing campaigns. Plan marketing campaigns. Segment our database. | | |
| <ul style="list-style-type: none"> Users | Banking Data <ul style="list-style-type: none"> For Users, your bank account number, card data and fiscal information. | <ul style="list-style-type: none"> Perform the agreements we have with you and to manage our relationship in this respect. In order for Customers to avail additional features from the Merchants onboarded onto the Platform. Monitor our activities (measuring and compiling statistics on sales, | <ul style="list-style-type: none"> Your consent. | <ul style="list-style-type: none"> Our registration forms, order forms or correspondence with you. |



| Customer type | Information we process | Purpose / activity | Lawful basis | Mode of Collection |
|---------------|------------------------|---|--------------|--------------------|
| | | <p>purchases, payments, number of Customers).</p> <ul style="list-style-type: none">▪ Improve the quality of our products and Platform.▪ To monitor the User's financial regularity on the Platform. | | |



- 6.2. You undertake that all Personal Data provided to us by you is true, complete, and accurate and you must notify us of any changes to such Personal Data.
- 6.3. We do not knowingly collect data from, or market to, children below the legal age as established under their relevant domestic laws, but in no event from children below the age of 18 (eighteen) years. By using the Platform, you represent that you are at least 18 (eighteen) years of age or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Platform. If we learn that Personal Data from Customers who are less than 18 (eighteen) years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records.

7. WE PROCESS AGGREGATED, ANONYMISED AND DE-IDENTIFIED INFORMATION

- 7.1. We may also create, process, collect, use, and share aggregated, anonymised, or de-identified data such as statistical or demographic data for any purpose as permitted under applicable laws. We may analyse such aggregated and anonymized information in a manner to further enhance the level of the Platform that we offer on our Platform for business or research purposes, including improving and customizing the Platform for ease of use. Such information also includes average number of Customers of the Platform, the average clicks on the Platform, the features used, the response rate, etc. and other such statistics regarding groups or individuals. In doing so, we shall not be making disclosures of any Personal Data as such information will then no longer identify you as an individual person and we ensure that ensures the data is put beyond further use, despite being derived from your Personal Data. We may archive this information to use it for future communications for providing updates and/or surveys. Furthermore, we may also use this information to comply with legal or regulatory obligations.

8. WHEN WE MAY DISCLOSE THE PERSONAL DATA

- 8.1. Your Personal Data may, for the purposes set out in this Privacy Notice, be disclosed within or outside of the original country of collection for processing to the following groups of recipients:
 - 8.1.1. our employees, our affiliates, and their employees.
 - 8.1.2. our third-party consultants, (sub-)contractors, merchants, sellers, suppliers or other service providers who may access your Personal Data when providing services to us (including, but



not limited, to information technology support services). This includes information technology experts who design and host our Platform, and general service companies;

- 8.1.3. auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes;
 - 8.1.4. analytics and search engine providers that assist us in the improvement and optimisation of our Platform;
 - 8.1.5. our successors in title, our prospective sellers, or buyers of our business or to our affiliates when we have a merger or re-organisation;
 - 8.1.6. government bodies and law enforcement agencies and in response to other legal and regulatory requests;
 - 8.1.7. any third-party where such disclosure is required in order to enforce or apply any terms and conditions pertaining to our Platform or other relevant agreements; and
 - 8.1.8. protect the rights, property, integrity, or security of our company, our Customers, or others (including, without limitation, you). This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- 8.2. Where your details are provided to any other party in accordance with an express purpose, we will require them to be kept safe and secure your Personal Data and only use it for the intended purpose.

9. SAFEGUARDS FOR INTERNATIONAL TRANSFERS

- 9.1. Your Personal Data is stored and transferred in compliance with applicable regulations.
- 9.2. You should be aware that certain third-party service providers, including, without limitation, the groups of recipients stipulated under section 8 above of this Privacy Notice as well as customer support providers, may be located in, or have facilities that are located outside the original country of collection of your Personal Data.
- 9.3. As mentioned in section 9.2 of this Privacy Notice, we may transfer of Personal Data outside the original country of collection of your Personal Data, and we shall do so only when the country or territory to which the Personal Data is to be transferred (i) has a bilateral or multilateral agreements related to Personal Data protection with that country or (ii) has special legislation on personal data protection therein, including the most important provisions, measures, controls, requirements and rules for protecting the privacy and confidentiality of the your Personal Data and their ability to exercise their rights, and provisions related to



imposing appropriate measures on the controller or processor through a supervisory or judicial authority.

- 9.4. However, some of the international organizations and countries to which your Personal Data may be transferred do not benefit from an appropriate data protection regulatory framework. For such international organizations and countries, we shall transfer your Personal Data, only upon ensuring that a suitable degree of protection is afforded to it through the implementation of the necessary safeguards, such as an adequacy decision by the relevant authority, adequate binding corporate rules or through the inclusion of standard contractual clauses in our agreements with such organizations and countries, in addition to taking other steps as required under applicable law.
- 9.5. We may also transfer your Personal Data to recipients outside the original country of collection of your Personal Data based on the following grounds (i) if such transfer is necessary for judicial processes; or (ii) if such transfer is necessary for entering into or performing a contract between us and you; or (iii) between us and a third party for your interests; or (iv) if such transfer is necessary for an act relating to international judicial cooperation; or (v) if the transfer is necessary for protection of public interest. We shall notify you with regards to the specific safeguard we shall adopt in transferring your Personal Data to such an international organization and/or country if you require such data.
- 9.6. Insofar as the transfer of your Personal Data does not fall under (i) to (v) of section 9.5 above, we may still need to transfer your Personal Data to the groups of recipients listed in section 8, with your express consent. You provide your express and unequivocal consent through the acceptance of this Privacy Notice for such transfer, provided that such transfer shall not contradict the public or security interest of any country in which the Company provides the Platform.
- 9.7. If you choose to proceed with a feature on the Platform that requires the involvement of a third-party service provider, then your Personal Data may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located. If you wish to procure specific information about the third-party service providers with whom your Personal Data has been shared, please contact us at s.abdulhamidov@alifx.ae.

10. SECURITY OF PERSONAL DATA

10.1. Information security



- 10.1.1. The Internet is not a secure medium. However, we have put in place a range of security procedures, as set out in this Privacy Notice. Where you have been allocated a profile on the Mobile App or Partners App, as the case may be, this area is protected by your username and password, which you should never divulge to anyone else.
- 10.1.2. We are committed to ensuring that your Personal Data is secure. To prevent unauthorised access or disclosure we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the Personal Data we collect via our Platform. We use industry-standard technical mechanisms and ensure that our affiliates or vendor entities use data encryption technology while implementing restrictions related to the storage of and the ability to access your Personal Data.
- 10.1.3. Please be aware that communications over the Internet, such as emails, are not secure unless they have been encrypted. Your communications may route through a number of countries before being delivered. This is the nature of the world wide web/internet. While we make our best efforts to secure personal data and facilitate access to your Personal Data, it is important to note that no transmission over the internet or any method of electronic storage can be guaranteed to be absolutely 100% secure. We cannot accept responsibility for any unauthorised access or loss of Personal Data that is beyond our control.
- 10.1.4. We will use reasonable endeavours to implement appropriate policies, rules, and technical measures to protect the Personal Data that we have under our control (having regard to the type and amount of that data) from unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction, or accidental loss.
- 10.1.5. We will ensure that your information will not be disclosed to government institutions or authorities except if required by law (e.g., when requested by regulatory bodies or law enforcement organisations in accordance with applicable legislation).
- 10.1.6. We also aim to conduct all applicable security risk assessments to ensure the availability of risk mitigation controls, to better safeguard the integrity of your data.
- 10.1.7. Our facilities are scanned on a regular basis for security holes and known vulnerabilities, to best ensure its security. Your Personal Data is contained behind secured networks and is only accessible by a limited number of individuals who have special access rights to such systems and are required to keep the Personal Data confidential.



10.1.8. We also have mechanisms in place to access your Personal Data in case of an actual or technical failure. We also ensure testing and evaluation of our technical and organizational measures at regular intervals to gauge the effectiveness of such measures.

10.2. No guarantee

10.2.1. Without prejudice to our efforts on protection of your Personal Data, nothing contained in this Privacy Notice constitutes a warranty of security of the facilities, and you agree to transmit data at your own risk.

10.2.2. Please note, that we do not guarantee that your Personal Data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. Please, always check that any website on which you are asked for financial or payment information in relation to our Platform is in fact legitimately owned or operated by us.

10.2.3. If you do receive any suspicious communication of any kind or request, do not provide your information and report it us by contacting our offices immediately at info@alifx.ae. Please also immediately notify us at s.abdulkhamidov@alifx.ae if you become aware of any unauthorized access to or use of your account.

10.2.4. Furthermore, we cannot ensure and do not warrant the security or confidentiality of data transmitted to us or sent and received from us by internet or wireless connection, including email, phone, instant messaging service or SMS, since we have no way of protecting that information once it leaves and until it reaches us. If you have reason to believe that your data is no longer secure, please contact us at info@alifx.ae.

10.3. Data breaches

10.3.1. Should your Personal Data be breached, and your financial and personal security be at risk, we shall promptly and immediately communicate to you the nature of the breach which has taken place, the likely consequences of such a breach and shall describe thoroughly the measures we have implemented to address the breach and to mitigate any and all adverse effects to you and your rights. We will also notify the relevant regulator of the breach in accordance with applicable regulations. In the unlikely event of a breach occurring which you are made aware of, please immediately reach out to us at info@alifx.ae for further information and for further advise on how to mitigate the potential adverse effects of such a breach.

11. COOKIES POLICY



This section of the Privacy Notice explains what cookies are, what information we collect using cookies and how we use cookies in respect of the Platform.

11.1. **What is a Cookie?**

11.1.1. A 'cookie' is a small piece of encrypted text saved on the browser or hard drive in your computer or mobile device when you visit a website. Cookies are selected pieces of information that websites or mobile applications send to your device or computer's hard drive, while you are viewing or using our Platform. It allows us to recognise you and make your next visit easier and the experience of our Platform more useful to you. Cookies can be stored for varying lengths of time on your browser or device.

11.1.2. We use both session / transient cookies (which expire once you close your device web browser) and persistent cookies (which stay on your device until you delete them) to collect information to provide you with a more personalized and interactive experience in using our Platform. This type of data is collected to make our Platform more useful to you and to tailor your experience with us to meet your special interests and needs.

11.2. **How we use cookies**

11.2.1. When you use and access our Platform, we may place a number of cookie files on your device's web browser. We use cookies to enable certain functions of the Platform viz. to provide analytics, to prevent fraudulent or illegal activity, to store your preferences, to enable advertisements delivery, including behavioural advertising. We also use cookies to enhance your browsing experience by:

- i. Recognizing when you log in and any preferred settings.
- ii. Giving you a browsing experience that is unique to you and to serve you content which we believe improves your sites experience.
- iii. Analysing how you use our sites which helps us to troubleshoot any problems and to monitor our own performance.

11.2.2. In addition to our own cookies, we may also use various third parties' cookies to report usage statistics of our Website, deliver advertisements on and through our Platform, and so on.

11.3. **Types of cookies we use**

11.3.1. We use the following four type of cookies:

- i. Essential cookies: These cookies are essential to let you move around the Platform and use its features. These cookies allow our Platform to provide services at your request. We use essential cookies to authenticate Customer and prevent fraudulent use of



Customer accounts.

- ii. Performance cookies: These cookies may be used to collect information about how you use the Website e. g., which pages you visit most often, and if you experience any error messages. They also allow us to update our Platform to improve performance and tailor it to your preferences. These cookies do not collect any information that could identify you - all the information collected is anonymous.
- iii. Functionality cookies: These cookies are used to remember the choices you make, e. g., your username, log in details and language preferences. They also remember any customizations you make to give you enhanced, more personal features of your digital experience.
- iv. Advertising and targeting cookies: These cookies are used to collect information about your visit to our Website, the content you viewed, browsing habits to deliver adverts which are more relevant to your interest, links you followed and information about your browser, device, and your IP address. They also measure the effectiveness of advertising campaigns.

11.4. Cookies preferences

Please note, that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer on our Platform. You may not be able to store your preferences, and some of our pages might not display properly. We are not responsible and will not be held liable for any loss resulting from your decision or inability to use cookies.

12. YOUR RIGHTS

12.1. We will take all reasonable steps to ensure that all Personal Data we collect, use, or disclose is accurate, complete, and up to date. Please contact us if your details change or if you believe the Personal Data we have about you is not accurate or complete.

12.2. Subject to any restrictions, and the specific rights, enshrined in the data protection laws and regulations of the country in which you are using the Platform, you may also have the right to:

12.2.1. **Request access to your Personal Data** (commonly known as a “data subject access request”). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.



- 12.2.2. **Request correction** of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.
- 12.2.3. **Request erasure of your Personal Data.** This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which you will be notified of.
- 12.2.4. **Object to processing** of your Personal Data and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which do not override your rights and freedoms.
- 12.2.5. **Request restriction of processing** of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios (i) if you want us to establish the Personal Data's accuracy; (ii) where our use of the Personal Data is unlawful but you do not want us to erase it; (iii) where you need us to hold the Personal Data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (iv) you have objected to our use of your Personal Data but we need to verify whether we have overriding legitimate grounds to use it.
- 12.2.6. **Request the transfer of your Personal Data** to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- 12.2.7. **Withdraw consent at any time** where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain features of the Platform to you. We will advise you if this is the case.

13. HOW LONG WE KEEP PERSONAL DATA



13.1. We retain Personal Data, including customer data, transactional data, and other session data, linked to your account.

13.2. Your Personal Data will be retained for no period longer than as required by us for the purposes it was collected for, for the purposes of using our Platform, and for meeting any legal, accounting, reporting, government, regulatory or law enforcement requirements. However, all Personal Data documents, records and files will be securely retained for a minimum of 5 (five) years. Such retention period shall be calculated from the date of closing of your account.

14. CONTACT US

14.1. If you have any queries or issues pertaining to your information or our Privacy Notice, then please do write to us at any time by emailing us at info@alifx.ae.



Supplemental Information for Residents of Certain U.S. States (including California)

1. APPLICATION

- 1.1. In this supplement, we provide additional information to certain U.S. states residents (including residents of California) about your privacy rights under applicable privacy laws including, where applicable, the California Consumer Privacy Act (“**CCPA**”). In the context of U.S. states, this supplement does not address or apply to our collection and processing of data that is exempt from applicable law, or Personal Data about our employees, personnel, applicants and candidates, which is covered by separate notices and policies.

2. USE AND DISCLOSURE OF YOUR PERSONAL DATA

- 2.1. The Personal Data we process, the lawful bases for processing, the purpose(s) of processing, and modes of collection are described above in section 6 of the Privacy Notice. Further, we disclose your Personal Data in accordance with section 8 of the Privacy Notice, insofar as not restricted by applicable law.
- 2.2. We may collect the types of Sensitive Personal Information (as defined under the CCPA) about California residents for the purposes of processing listed in section 6 of the Privacy Notice; however, we do not collect, use, disclose or process Sensitive Personal Information about California residents beyond the purposes authorized by the CCPA.
- 2.3. We do not disclose Personal Data to third parties in exchange for monetary compensation, we may share certain Personal Data and Technical Data (as defined in section 6 of the Privacy Notice) to advertising networks, data analytics providers and social networks to improve and evaluate our advertising campaigns and to better reach users and prospective users with more relevant ads and content. We do not sell or share Sensitive Personal Information.

3. Exercising Your Rights

- 3.1. If you are a resident of a U.S. state you may exercise your rights as described in section 12 of the Privacy Notice.
- 3.2. In addition, California residents can opt out of ‘sharing’ of their Personal Data. Our U.S. Websites respond to global privacy control (“**GPC**”) signals. This means that if we detect that your browser is communicating a GPC signal, we will, subject to applicable law, process that as a request to opt that particular browser and device out of sharing on our



Websites. Certain residents may also opt out of any cookie and pixel related 'sharing' or targeted advertising on any of our Websites by adjusting your cookie privacy preferences for that Website. Note that if you come back to our Websites from a different device or use a different browser on the same device, you will need to enable GPC or set your cookie preferences for each browser and device you use to access our Websites and services. More information about GPC is available at: <https://globalprivacycontrol.org/>.
