

# PRIVACY POLICY

## INTRODUCTION:

ENTERX MARKETING FZ - LLC, its subsidiaries, affiliates (collectively, the “ENTERX”, “Company”, “we”, “us”, or “our”) recognize the importance of protecting the privacy of all consumers (“you” or “user”) who access and/or use, whether as a guest or a registered user, our websites, or portions of our websites, including any content, functionality and services offered on or through our websites, any webpages, our online or offline mobile applications that run on smartphones, tablets and other devices which provide dedicated non-browser-based interaction between you and our sites (all of which are collectively called our “Sites”).

This Privacy Policy will inform you as to our purposes for collecting and processing your personal information, our practices for collecting, using, maintaining, retaining, protecting and disclosing your personal data when you visit this and all of our Sites (regardless of where you visit it from) and inform tell you about your privacy rights and how the law protects such rights.

## 1. IMPORTANT INFORMATION AND WHO WE ARE:

### PURPOSE OF THIS PRIVACY POLICY

This Privacy Policy aims to give you information on how the Company collects and processes your personal data through your use of any of its Sites, including any data you may provide through this Site when you register or sign in on any of our Sites, purchase a product or service or take part in a competition. We will only use your personal data to provide you with our services, for legitimate business purposes and to fulfil legal obligations. It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may 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 data. This Privacy Policy supplements these other notices and is not intended to override them.

### PERSONS UNDER THE AGE OF 18 YEARS

The Sites are not intended for children and we do not knowingly collect data relating to children. Our Sites are not intended for use by persons under 18 years of age without legal parental or guardian consent. No one under the age of 18 may provide any personal information to or on our Sites without

legal parental or guardian consent. We do not knowingly collect personal information from persons under 18 if such information is provided without legal parental or guardian consent. If you are under 18, do not use or provide any information on our Sites, or on or through any of their features register on the Sites, make any purchases through our Sites, use any of the interactive or public comment features of our Sites or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use without legal parental or guardian consent. If we learn we have collected or received personal information from a person under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a person under 18 for which there is no legal parental or guardian consent, please contact us.

### CONTROLLER

The Company is made up of different legal entities. This Privacy Policy is issued on behalf of the Company so when we mention “Company”, “ENTERX”, “we”, “us” or “our” in this Privacy Policy, we are referring to the relevant company responsible for processing your data.

We have appointed a data protection officer ("DPO") who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

### CONTACT DETAILS

*Attention: Data Protection Officer*

*Email address: [compliance@enterx.ae](mailto:compliance@enterx.ae)*

You have the right to make a complaint at any time to the relevant supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the relevant supervisory authority so please contact us in the first instance.

For any questions or comments relating to this Privacy Policy or the manner in which we collect and use your personal data, please contact us.

### CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 11th November 2024 and shall come into effect on 13<sup>th</sup> November 2024 ("Effective Date"). Historic versions of this document can be obtained by contacting us, if any.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### THIRD-PARTY LINKS

The Sites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Sites, we encourage you to read the privacy policy of every website or other site you visit.

## 2. THE DATA WE COLLECT ABOUT YOU:

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Depending on which of our products and/or services you use and how you interact with our Sites, we collect different kinds of information from or about you. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- (a) Identity Data includes first name, last name, address, username or similar identifier, marital status, title, date of birth, and gender.
- (b) Contact Data includes billing address, delivery address, location, email address, and/or telephone numbers.
- (c) Financial Data includes payment card details and payment history.
- (d) Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- (e) Technical Data includes internet protocol (IP) address, your login data, browser type and version, make and model (mobile phones only), operating system, hardware version, platform, device settings, and other technology identification on the devices used to access our Sites, file

and software names and types, device identifiers, time zone setting and location, device locations such as through GPS, Bluetooth or WiFi signals, browser plug-in types and versions, operating system and platform, connection information such as the name of your mobile operator or ISP, browser type, language and time zone, mobile phone number and IP address.

- (f) Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- (g) Usage Data includes information about how you use our Sites, products, and services including the redemption of our offers, how you use your devices to access our Sites, including the screens you visit and searches you make.
- (h) Other Data includes:
  - Photos or other data uploaded onto any of our Sites by you or shared with other users of our Sites by you via our Sites.
  - Communications with us via social media platforms, email, electronic messages, and other electronic and non-electronic communications.
  - Third-party partner information related to how you use our third-party partners, such as your reviews of our merchant partners or other service providers.
  - Your networks and connections made available to us, depending on the permissions you have granted, from your mobile and desktop devices' address book contacts, and other social media such as Facebook, Instagram, Pinterest, and Twitter.
- (i) Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a

specific Site feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect the following Special Categories of Personal Data: your philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. Nor do we collect any information about criminal convictions and offences.

#### IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?:

We use different methods to collect data from and about you including through:

- (a) Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - Apply for or purchase our products or services.
  - Create an account or register on our Sites.
  - Subscribe to our service or publications.
  - Request marketing to be sent to you or further services to be provided to you.
  - Enter a competition, promotion, or survey.

- Correspond with us (online or offline including via email addresses and phone numbers), if you contact us.
  - Post material on our Sites.
  - Give us some feedback.
- (b) You also may provide information to be published or displayed (hereinafter, “posted”) on public areas of our Sites or transmitted to other users of our Sites or third parties (collectively, “User Contributions”). Your User Contributions are posted on and transmitted to others at your own risk. Although we limit access to certain pages, you may set certain privacy settings for such information by logging into your account profile or by contacting us. Please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of our Sites with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.
- (c) Automated technologies or interactions. As you interact with our Sites, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, web beacons, and other similar technologies. We may also receive Technical Data about you if you visit other Sites employing our cookies.
- (d) Cookies: We automatically capture some information through the use of cookies. A cookie is a small file that is placed onto your desktop or mobile device when you visit our Sites in order to enable certain features and functionality of our Sites. Our cookies can be categorized into four types, each of which is outlined below
- Category 1: Strictly necessary cookies. These cookies are essential for enabling our Sites to provide certain of your requested services such as retaining your shopping bag items.
  - Category 2: Performance cookies. Performance cookies collect anonymous information on the users of our Sites to enable us to improve the operation of our Sites. For example, we utilize cookies to help us understand how customers arrive at and browse or use our Sites, and highlight improvement areas such as navigation,

shopping experience, and marketing. The data stored by these cookies does not include personal details from which an individual's identity can be established.

- Category 3: Functionality cookies. These cookies retain choices you make such as member ID, email ID, and other preferences in order to help you avoid having to re-enter the information as you navigate through our Sites, including the shopping cart.
  - Category 4: Targeting or advertising cookies. These cookies collect information about your browsing habits to allow us to provide advertising relevant to you and your interests. The cookies retain information about the websites you have visited. This information is shared with other parties such as advertisers on an anonymous basis. Your personally identifiable information such as your name and address is not shared with such third parties. For example, we use third-party companies to provide you with more personalized advertisements when you visit certain third-party websites.
- (e) Web beacons: Pages of our Sites and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an e-mail and collect other related website and app statistics (for example, recording the popularity of certain app content and verifying system and server integrity).
- (f) We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.
- (g) Log files: We may use log files to capture your activities on our apps as they interact with our Sites. Information captured in such log files may include the types of content you view or engage with and the frequency or duration of your activities.
- (h) Third parties or publicly available sources: We may receive personal data about you from various third parties and public sources as set out below: and public sources as set out below:

- Technical Data from the following parties:
  - Analytics providers based either inside or outside the EU;
  - Advertising networks based either inside or outside the EU;
  - Search information providers based either inside or outside the EU;  
or
  - Third parties we contract with and/or their subsidiaries and affiliates to provide you a service based either inside or outside the EU.
- (i) Contact, Financial, and Transaction Data from providers of technical, payment, and delivery services based either inside or outside the EU.
- (j) Identity and Contact Data from data brokers or aggregators based either inside or outside the EU.
- (k) Identity and Contact Data from publicly available sources based either inside or outside the EU.

#### 4. HOW WE USE YOUR PERSONAL DATA:

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- (a) Where we need to perform the contract we are about to enter into or have entered into with you.
- (b) Where we need to perform a contract we have with a third party to provide you a product or service.
- (c) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- (d) Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third-party direct marketing communications to you via email, text message or other means. You have the right to withdraw consent to marketing at any time by contacting us.



## 5. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA:

We have set out below, in a tabular format, a description of all the purposes and methods for which we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us.

If you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

### MARKETING:

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

**Direct Marketing by the Company** If you do not wish to have your personal data used by the Company to promote our own or third parties' products or services, you can opt-out by contacting us. If we have sent you a promotional e-mail, you may send us a return e-mail asking to be omitted from future e-mail distributions. This opt-out does not apply to information provided to the Company as a result of a product or service purchase, product service experience or other transactions.

**Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target audience preferences, you can opt-out by Contacting us.

### PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data and Special Categories of Personal Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered

for a promotion and, in each case, you have not opted out of receiving that marketing.

### THIRD-PARTY MARKETING

By consenting to this Privacy Policy, you acknowledge and agree that your personal data (such as your name, email address, gender, date of birth and nationality) may be shared with third parties for marketing purposes. These third parties may have their own privacy policies that apply when they collect information from or about you. However, these third parties may provide you with ways to choose not to have your information collected or used in this way.

### OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

## 6. COOKIES:

You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Sites may become inaccessible or not function properly. For more information about the cookies we use, please see Section 3 – How is your Personal Data collected above.

## 7. LOCATION INFORMATION

You can choose whether or not to allow our Sites to collect and use real-time information about your device's location through the device's privacy settings. If you block the use of location information, some parts of our Sites may then be inaccessible or not function properly.

## 8. CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 9. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in Section 18 – Glossary below.
- External Third Parties as set out in Section 18 – Glossary below.
- Third parties listed in the table in Section 4 – How we use your Personal Data above.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.
- To a third party you nominate to fulfil the purpose for which you provide it. For example, if you give us an e-mail address to use the "e-mail a friend" feature of our Sites or you nominate another person to become a secondary member in family account, we will transmit the contents of that e-mail and your e-mail address to the recipients.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

10. DATA SECURITY:

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

11. DATA RETENTION:

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 12. YOUR LEGAL RIGHTS:

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the following (see Section 10 – Glossary below): Request access to your personal data

- *Request correction of your personal data.*
- *Request the erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact us.

## 13. UNFOUNDED ACCESS REQUESTS:

If your request to access your personal data (or to exercise any of the other rights) is clearly unfounded, unsubstantiated, repetitive or excessive, we may refuse to comply with your request in these circumstances.

## 14. WHAT WE MAY NEED FROM YOU:

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## 15. TIME LIMIT TO RESPOND:

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or

you have made a number of requests. In this case, we will notify you and keep you updated.

## 16. GLOSSARY:

### LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### THIRD PARTIES

#### INTERNAL THIRD PARTIES

Our companies, their subsidiaries and affiliates acting as joint controllers or processors who provide IT and system administration services and undertake reporting.

#### EXTERNAL THIRD PARTIES

- Service providers acting as processors who provide IT and system administration services or who we use to support our business and who are bound by contractual obligations to keep personal data confidential and secure and use it only for the purposes for which we disclose it to them.

- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance, and accounting services.
- HM Revenue & Customs, regulators, and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.
- Any other party, their subsidiaries, and affiliates which we have contracted with to provide you with a service and/or product.

### YOUR LEGAL RIGHTS

You have the right to:

- 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.
- 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 data you provide to us.
- Request the 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. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) 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 override your rights and freedoms.

- 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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have to override legitimate grounds to use it.
- 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.
- 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 products or services to you. We will advise you if this is the case at the time you withdraw your consent.

#### 17. UPDATES TO THIS PRIVACY POLICY:

We may amend this Privacy Policy from time to time to keep it up to date with legal requirements and the way we operate our business. If we decide to change our Privacy Policy, we will place any updates on this webpage and the privacy sections of any relevant platforms.



18. LEGAL:

Without prejudice to your rights under applicable laws, our Privacy Policy is not a contract and does not create any legal rights or obligations.

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