

PRIVACY POLICY

This Privacy Policy explains how Mahsul Trading and Services DMCC as “**Mahsul Trading**” (collectively “**we**”, “**us**”, “**our**”) collect, use, share, transfer, and store personal information through our website, www.mahsul.ae (the “**Site**,” including all subdomains) and provides information about your rights according to applicable data privacy laws. Mahsul Trading has its registered office and place of business at Jumeirah Bay Tower X2, 16th Floor, Unit N 1607-026, Jumeirah Lakes Towers, P.O. Box N 212997 Dubai, United Arab Emirates. Any references made to “**you**” and “**your**” are to users of our Site.

Our Privacy Policy must be read together with our Terms of Use and any other legal notices made available on our Site.

“**Personal Information**” shall mean any data that can be used to identify directly or indirectly any individual by linking the data, through the use of identification elements such as his/her name, voice, image, identification number, his/her electronic identifier, his/her geographical location, or by one or more physical, physiological, economic, cultural or social characteristics.

Please read the following terms carefully to understand our views and practices regarding your Personal Information and how we will treat it. By visiting, using and/or registering with the Site, you acknowledge and confirm that you accept and consent to the practices described in this Privacy Policy.

1. **COLLECTION OF PERSONAL INFORMATION**

When do we collect Personal Information?

1.1. We collect Personal Information from you in a variety of ways when you interact with us. Some examples are when you:

- (a) fill in forms that are made available on the Site;
- (b) place an order on the Site;
- (c) conduct a transaction where we collect Personal Information, including when required by law and regulations;
- (d) respond to our surveys or participate in a promotion;
- (e) register for newsletters or other marketing communications received from us; or
- (f) contact us with a query or complaint.

What Personal Information do we collect?

1.2. We may collect and process the following Personal Information:

Information you give us, such as:

- (a) your name;

- (b) your email address;
- (c) your address (business and personal);
- (d) your landline and mobile telephone numbers (business and personal);
- (e) your geographic location (country/territory where you are living and/or working);
- (f) your job title, role and the name of your employer;
- (g) the industry sector in which you work;
- (h) the country or countries, industry sector(s) and area(s) of our services in respect of which you wish to receive communications (where you have registered on the Site); and
- (i) any other information that you choose to provide to us on the Site.

Information we collect about you online

1.3. With regard to each of your visits to our Site, we may automatically collect the following information:

- (a) **Information about your visit**, including the full Uniform Resource Locators (URL) clickstream to, through and from the Site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouseovers), and methods used to browse away from the page and any phone number used to call our customer service number;
- (b) **Technical information**, such as Cookie and tracking information (including the internet protocol (IP) address used to connect your computer to the Internet), your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform messages you send or receive using the messaging functionality on any of our platforms or systems, and other technical data that may uniquely identify your device, system or browser;
- (c) **Account history information** related to the products you searched, and the activities associated with your account;
- (d) **Error reports and performance information** of the Site and any problems you experience, including error reports; and
- (e) **Troubleshooting and help information** when you contact us to make a purchase or for customer support services, phone conversations, or chat sessions with our representatives, which may be monitored and/or recorded.

Information we receive from other sources

1.4. We may obtain information about you from third party sources such as public databases, marketing partners, social media platforms, and from other third parties who have your consent to pass your details on to us. Where permissible under applicable local laws, we

may combine information that you have provided to us with other information that we already hold about you and which we have collected for a compatible purpose.

2. **PURPOSES**

How do we use your Personal Information?

2.1. We may use your Personal Information when permitted by applicable law to:

- (a) respond to your queries, and/or provide the services and/or information that you have requested;
- (b) carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us;
- (c) to perform record keeping, statistical analysis, internal reporting and research related activities;
- (d) facilitate your use of the Site;
- (e) ensure network and information security;
- (f) notify you about changes to our services;
- (g) investigate any complaint you make;
- (h) provide evidence in any dispute or anticipated dispute between you and us;
- (i) customize various aspects of the Site to improve your experience;
- (j) host, maintain and otherwise support the operation of the Site;
- (k) detect and prevent fraud and other criminal offences and for risk management purposes;
- (l) perform business and disaster recovery related activities (e.g. to create back-ups);
- (m) to retain/store document;
- (n) perform database management;
- (o) provide you with marketing and promotional communications, and deliver targeted and relevant advertising and relevant offers to you, which includes better predicting content and marketing offers that may interest you, including through post or electronic communications, such as messaging systems and email;
- (p) protect the rights, property, and/or safety of Mahsul Trading, its personnel, other users of the Site and others;
- (q) to respond to legal claims and processes;
- (r) to enforce the Terms of Use; and
- (s) ensure the quality of the services we provide to our users.

- 2.2. In addition, we may use your Personal Information for additional specific purposes made clear at the point of collection on particular pages of the Site.
- 2.3. If you choose not to provide Personal Information requested by us, we may not be able to provide you with the information and/or services you have requested or otherwise fulfil the purpose(s) for which we have asked for the Personal Information. Aside from this, your visit to the Site will remain unaffected.

Legal grounds for collection and use of Personal Information

- 2.4. Our legal basis for collecting and using your Personal Information as described in this Privacy Policy will depend on the Personal Information concerned and the specific context in which we collect it as well as applicable law. In general, we collect and process your Personal Information on one or more of the following grounds:
 - (a) Your consent, for example where we have obtained your consent to process your Personal Information for certain activities or where we are required to obtain consent under applicable law. You are free to withdraw your consent at any time by contacting dubai@mahsul.ae. If you withdraw your consent, it will not affect the lawfulness of any processing based on your consent before you withdrew it. Where applicable, we may ask for your consent to processing at the point where you provide your Personal Information;
 - (b) To comply with our contractual obligations. We will advise you upon collection whether the provision of your Personal Information is mandatory and of the possible consequences if you do not provide us with your information;
 - (c) To comply with our legal and regulatory obligations; where other laws require the processing of your Personal Information (for example, health and safety, taxation and anti-money laundering laws) or where we need your personal information to protect your vital interests or those of another person; and/or
 - (d) To protect your interests.

3. COOKIES

- 3.1. Cookies are small text files which are placed onto your device when you access the Site. Cookies enable websites to remember who you are when you first visit the Site, and keep you logged in for repeat visits, if you consent. We use cookies and other online tracking devices to make your online experience more efficient and enjoyable.
- 3.2. The information we obtain from our use of Cookies will not usually contain your Personal Information. Although we may obtain information about your device such as your IP address, your browser and/or other internet log information, this will not, usually, identify you personally. In certain circumstances, we may collect Personal Information about you – but only where you voluntarily provide it (e.g. by completing an online form).
- 3.3. In most cases, we will need your consent in order to use Cookies. The exception is where the Cookie is essential in order for us to provide you with a service you have requested.

- 3.4. If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of the Site.

4. **SHARING INFORMATION WITH THIRD PARTIES**

- 4.1. Some services that we provide require the involvement of third parties. We may share or provide access to your Personal Information to these third parties for the purposes of their involvement. We have carefully selected these third parties and taken steps to ensure that your Personal Information is adequately protected.

Sharing with service providers

- 4.2. We share your Personal Information with our third-party service providers based in and out of the United Arab Emirates (**UAE**) who we engage to provide support services in relation to the Site for the purposes of:

- (a) hosting and maintaining the site;
- (b) providing data storage;
- (c) assisting us with database management; and
- (d) assisting us with related tasks or processes.

- 4.3. All our service providers are bound by written contracts to process Personal Information provided to them only for the purpose of providing the specific service to us and to maintain appropriate security measures to protect your Personal Information.

Sharing with other third parties

- 4.4. We share your Personal Information with:

- (a) our accountants, auditors, lawyers or similar advisers when we ask them to provide us with professional advice;
- (b) any other third party if we are under a duty to disclose or share your Personal Information in order to comply with any legal obligation, or to protect the rights, property and/or safety of Mahsul Trading, our personnel or others;
- (c) any other third party for the purposes of acting in accordance with the requirements of a court, regulator or government agency, for example, complying with a search warrant or court order or acting in accordance with an applicable law or regulation; or
- (d) investors and other relevant third parties in in the event of an actual potential sale or other corporate transaction related to Mahsul Trading.

- 4.5. Our Site 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 Personal Information about you. We do not control these third-party websites and are

not responsible for their privacy statements. When you leave the Site, we encourage you to read the privacy notice of every website you visit.

5. **INTERNATIONAL TRANSFERS**

- 5.1. The transfer of your Personal Information to third parties may involve your Personal Information being transferred to and stored in servers and facilities located in countries outside the UAE or region in which you reside. Some of these countries may not provide the same level of data protection as the country in which you reside.
- 5.2. We will only transfer your Personal Information outside of the UAE:
- (a) where the transfer is to a place or by a method or in circumstances that is regarded by the UAE as providing adequate protection for your Personal Information;
 - (b) where we have put in place standard data protection clauses adopted by the UAE Data Office or a relevant data protection authority; or
 - (c) where none of the above apply but we are still legally permitted to do so, for example if the transfer is necessary to fulfil our legal obligations for the establishment, exercise or defense of legal claims.
- 5.3. We only transfer personal information to these countries, when it is necessary for the services we provide you, or subject to appropriate safeguards that assure the protection of your Personal Information, such as contractual arrangements (as appropriate) or otherwise in accordance with applicable laws.
- 5.4. You can request further detail about the safeguards that we have in place in respect of transfers of Personal Information outside of the UAE and where applicable a copy of the standard data protection clauses that we have in place by contacting us at dubai@mahsul.ae.

6. **RETENTION OF YOUR PERSONAL INFORMATION**

- 6.1. It is our policy to retain your Personal Information for the length of time required for the specific purpose or purposes for which it was collected. However, we may be obliged to store some Personal Information for a longer time, taking into account factors including:
- (a) legal obligation(s) under applicable law to retain data for a certain period of time;
 - (b) statute of limitations under applicable law(s);
 - (c) to respond to any questions, complaints or claims made by you or on your behalf;
 - (d) disputes (current or potential); and
 - (e) guidelines issued by relevant data protection authorities.
- 6.2. Whilst we continue to process your Personal Information, we will ensure that it is treated in accordance with this Privacy Policy. Otherwise, we securely erase your information once it is no longer needed.

6.3. If you would like to find out the length of time we keep your Personal Information for a particular purpose you can contact us at dubai@mahsul.ae.

7. PROCESSING OF PERSONAL INFORMATION FOR MARKETING PURPOSES

7.1. We may contact you by email and other electronic means for direct marketing purposes to provide information on products and services that we believe will be of interest, to the extent permitted by applicable law, unless you object to receiving such information.

7.2. If you do not want to receive such communications from us, please contact us on the details set out below or by using the opt-out facilities provided within the relevant marketing material.

7.3. Your option not to receive promotional and marketing material: (a) shall not preclude us from corresponding with you, by email or otherwise, regarding your relationship with us; (b) shall not preclude us, including our employees, contractors, agents and other representatives, from accessing and viewing your Personal Information for the purposes as set out in this Privacy Policy; and (c) shall not preclude us from disclosing your Personal Information as described in this Privacy Policy for purposes other than sending you promotional and marketing materials.

8. SECURITY

8.1. We employ appropriate technical and organizational security measures to help protect your Personal Information and guard against access by unauthorized persons. Information storage is on secure computers in a locked and certified information center and information is encrypted wherever possible. We undergo periodic reviews of our security policies and procedures to ensure that our systems are secure and protected. Whilst we have put in place physical, electronic and managerial procedures to secure and safeguard your Personal Information, we will not be held responsible for any unauthorised access by third parties and we cannot guarantee that the Personal Information provided by you or that is transmitted via the Site or by electronic messaging is totally secure and safe and you provide it at your own risk.

8.2. Whilst we have put in place technical and organizational procedures to secure and safeguard your Personal Information, the Site may from time to time contain links to other websites not controlled by us. We do not accept responsibility or liability for the privacy practices, data collected or the content of such other websites. The operators of these linked websites are not under a duty to abide by this Privacy Policy. If there are terms and conditions, other privacy statements or policies appearing on those websites, you should also review them carefully as your use of those sites may be subject to them.

8.3. We encourage you to keep any passwords you use confidential and to be careful to avoid “phishing” scams where someone may send you an electronic message that appears to be from Mahsul Trading asking for your Personal Information.

9. CONFIDENTIALITY

We acknowledge that the information you provide us may be confidential. We do not sell, rent, distribute or otherwise make Personal Information commercially available to any third party, except that we may share information with our service providers for the purposes set out in this Privacy Policy. We will maintain the confidentiality of and protect your information in accordance with this Privacy Policy and all applicable laws.

10. YOUR RIGHTS

10.1. The following section explains your rights. The various rights are not absolute, and each is subject to certain exceptions or qualifications. We will grant your request only to the extent that it follows from our assessment of your request that we are permitted and required to do so under applicable data protection laws. Nothing in this Privacy Policy is intended to provide you with rights beyond or in addition to your rights as a data subject under the applicable data protection laws.

10.2. You have the right to request access to Personal Information that we may process about you. If you wish to exercise this right, you should:

- (a) put your request in writing (an email sent to dubai@mahsul.ae is acceptable);
- (b) include proof of your identity and address (e.g. a copy of your driving licence or passport, and a recent utility or credit card bill); and
- (c) specify the Personal Information you want access to.

10.3. You have the right to request us to provide you with a copy of the Personal Information we hold about you. If you wish to exercise this right, you should:

- (a) put your request in writing (an email sent to dubai@mahsul.ae is acceptable);
- (b) include proof of your identity and address (e.g. a copy of your driving licence or passport, and a recent utility or credit card bill); and
- (c) specify the Personal Information you want access to.

10.4. You have the right to request us to transfer your Personal Information to another party whenever this is technically feasible:

- (a) put your request in writing (an email sent to dubai@mahsul.ae is acceptable);
- (b) include proof of your identity and address (e.g. a copy of your driving licence or passport, and a recent utility or credit card bill); and
- (c) specify the Personal Information you wish to transfer and the third party you wish to transfer the information to.

10.5. You have the right to require us to correct any inaccuracies in your Personal Information free of charge. If you wish to exercise this right, you should:

- (a) put your request in writing (an email sent to dubai@mahsul.ae is acceptable);

- (b) provide us with enough information to identify you (for example, your name, include proof of your identity and address (e.g. a copy of your driving licence or passport, and a recent utility or credit card bill); and
 - (c) specify the information that is incorrect and what it should be replaced with.
- 10.6. You have the right to request that we delete your Personal Information in certain circumstances. This may include (but is not limited to) circumstances in which: (i) it is no longer necessary for us to retain your Personal Information for the purposes for which we collected it; or (ii) we are only entitled to process your Personal Information with your consent (i.e. because no other lawful ground for processing the Personal Information applies), and when you withdraw your consent. If you wish to exercise this right, you should:
 - (a) put your request in writing (an email sent to dubai@mahsul.ae is acceptable);
 - (b) provide us with enough information to identify you (for example, your name, include proof of your identity and address (e.g. a copy of your driving licence or passport, and a recent utility or credit card bill); and
 - (c) specify the information that you wish to erase and the reasons for wanting to erase the specified information.
- 10.7. You also have the right to ask us to restrict or stop the processing of your Personal Information for direct marketing, data profiling and automated processing purposes. If you wish to exercise this right, you should:
 - (a) put your request in writing (an email sent to dubai@mahsul.ae with a header that says 'Unsubscribe' is acceptable);
 - (b) if your objection is not to direct marketing in general, but to direct marketing by a particular channel (e.g. email or SMS), please specify the channel you are objecting to.
- 10.8. You also have the right to lodge a complaint with the UAE Data Office or the relevant data protection authority.
- 10.9. If we are relying on your consent to process your Personal Information for certain activities, you are free to limit or withdraw your consent at any time by contacting us using the details under “Our Contact Information”. If you withdraw your consent, it will not affect the lawfulness of any processing based on your consent before you withdrew it.
- 10.10. If you would like to exercise any of your rights in relation to the personal information we hold about you, you can make such request by emailing us on using the email address under the section headed “Our Contact Information” below.

11. CHANGES TO OUR PRIVACY POLICY

11.1. Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check this page regularly for changes to this Privacy Policy. If we make any material changes to this Privacy Policy, we will notify you and obtain your consent (if required under the applicable laws) before they take effect either through the Site or by sending you a notification.

12. **QUESTIONS AND CONCERNS**

12.1. If you have any questions or concerns about our handling of your Personal Information, or about this Privacy Policy, please contact us using the contact information set out below.

12.2. We are typically able to resolve privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive from us, you may escalate concerns to the UAE Data Office or relevant data protection authority.

13. **OUR CONTACT INFORMATION**

Email: sales@mahsul.ae