

## Privacy Policy

### General:

- This Privacy Policy (the “Policy”) describes how www.ThurayaRefill.com (hereinafter referred to as “ThurayaRefill”), collects, uses, shares and protects personal information that we collect from you, the end user of the ThurayaRefill website.
- While you use and enjoy our services, we want to keep you informed about our privacy policy towards management and security of your personal information. We value the trust you place in us, and hence insist upon the highest level of protection for securing your personal information. We are obligated to protect your personal information in accordance with applicable laws and regulations of the United Arab Emirates.
- This Policy should be read in conjunction with Terms and Conditions. Registration or usage of any of ThurayaRefill services implies your express consent and agreement to this Policy.
- This Policy is subject to modification based on changes in the business, legal and regulatory requirements, as applicable in the United Arab Emirates and will be made available to you online. We will make all efforts to communicate about significant changes to this policy. You are encouraged to periodically visit this page to review the policy and any changes.

### Collection of Information:

In order to enable us in providing you with the best in class services, we require certain information be shared by you with us. ThurayaRefill may collect the following types of information:

- **“Personal Information”** which shall mean information which could reasonably be used to identify you personally, which may include, but not limited to the following:
  - Basic details which you provide during the registration process such as Name, Phone Number, Email Address.
  - Transactions performed which can identify you as an individual through your customer ID or other relevant unique identifier.
  - Usage logs/Server logs/Cookies which may contain details of your personal or sensitive personal information.
  - Service specific information or identifiers such as MSISDN, Customer ID etc.

- **“Non-Personal Information”** which shall mean information that does not identify you or any other individual, and includes session, web usage and transaction data, aggregate log data and aggregate information. We use this information to inter-alia deliver our web pages to you upon request, to tailor our services to the interests of our users, to measure traffic within our services, to improve the quality, functionality and interactivity.

## Use of Information:

The information provided by you to us is used for a number of purposes connected with our business operations which may include the following:

- Verify your identity, access, privileges assigned and relationship with us.
- Provisioning of services, testing or improvement of services, recommending various products or services.
- Processing your requests, enquiries and complaints, customer services and related activities;
- Communicating to you about bills, invoices, existing or new offers, content, advertisements, surveys, key policies or other administrative information;
- Analytics and reviews for improvement of our services;
- Improving your experience while using our services by presenting advertising, products and offers tailored to you;
- Completing your purchase; and
- Other usages that you may consent to.

We will strive to keep your personal information confidential and will place reasonable security controls to protect it. Your Personal Information will be kept confidential as required under applicable laws in the United Arab Emirates.

Further, with respect to Non-Personal Information automatically collected and stored in files, we shall use this information to understand and analyze trends, to administer our services, to gather demographic information about the user base as a whole and to measure traffic patterns on our network. As Non-Personal Information does not personally identify you, we may use and disclose Non-Personal Information at our discretion.

## Sharing and Disclosure:

- We do not sell or rent personal information to any third party entities. We limit the disclosure of the Personal Information to certain circumstances, as provided below:
- Partners: we engage a number of vendors, consultants, contractors and take support of our group companies or affiliates (hereon referred to as our Partners). Our Partners provide a host of services including contact information verification, payment processing, customer service, website hosting, data analysis, infrastructure provision, IT services, and other similar services. These Partners play a key role in seamless delivery of our products and services to you. These Partners and their employees operate under a contract and strict security & confidentiality restrictions. We may provide our partners access to your information through our systems or may share your Personal Information with them to enable them to provide their services to you. If such disclosure occurs, at any time, we will ensure that it will only be made on need-to-know basis and we will also obligate the receiving parties to apply strict confidentiality protection to such information.
- Government or judicial process: We may share your Personal Information with the government / government authorities or agencies and legal or judicial authorities for any investigation or to comply with legal process or in response to a request by any of these authorities or to enforce applicable terms and conditions or to protect our, our users and Partners rights, privacy, safety or property.
- Legal Reasons: The information provided by you may be shared with our other entities and affiliates to help in detecting and preventing identity theft, frauds and other illegal activities; correlate or map related accounts to prevent misuse of our products & services and to provide you our services.
- Protection of ThurayaRefill: To protect your rights and/or those of our Partners, and to allow ThurayaRefill to pursue available remedies or limit the damages that it may sustain in case of unauthorised use / misuse of our products or the content thereon, by third parties.

## Storage, Retention and Security:

We have adopted reasonable security practices and procedures, to include strategic, operational, managerial, technical, and physical security controls to safeguard and protect your data and information. We have implemented such measures, as stated above, to protect against unauthorized access to and unlawful interception of Personal Information. Additionally, we have adopted measures to ensure that your personal information is accessible to our employees or partners employees strictly on the need to know basis.

Our website, applications, portals, and network equipment have industry standard security precautions in place to protect the loss, misuse and alteration of information which is in our environment. Whenever you change or access your account information, we facilitate the use of secure systems. The information in our custody and control is protected by adherence to reasonable security procedures in order to safeguard against unauthorized access.

Your information or data will primarily be stored in electronic form. However, certain data can also be stored in physical form.

We may enter into agreement with third parties to collect, store, process your information or data but under full compliance with applicable laws in the United Arab Emirates. These third parties may have their own security standards to safeguard your information or data and we will require such third parties to adopt reasonable security standards to safeguard your information / data on commercially reasonable basis.

We have taken appropriate steps for the security and protection of all our digital platforms including internal applications, however, we shall not be responsible for any breach of security or the disclosure of Personal Information for reasons outside our control, such as hacking, social engineering, cyber terrorism, espionage by third parties, or any events by way of force majeure such as sabotage, fire, flood, explosion, acts of God, civil commotion, strikes or industrial action of any kind, riots, insurrection, war, acts of government.

## **Third Party Websites, Applications and Services:**

ThurayaRefill website may include links to other websites/applications. Such websites/application are governed by their respective privacy policies, which are beyond our control. Once you leave our servers (you can tell where you are by checking the URL in the location bar on your browser), use of any information you provide is governed by the privacy policy of the operator of the website/application you are visiting. That policy may differ from ours. If you can't find the privacy policy of any of these websites/application via a link from the website's homepage, you should contact the website/application directly for more information.

## **Access, Correction and Deletion:**

We strive hard to keep our records updated and accurate with your latest information. You shall be responsible to ensure that the information or data you provide from time to time is and shall be correct, current and updated and you have all the rights, permissions and consent to provide such information or data.

Based on technical feasibility, we will provide you with the access to all your personal and sensitive personal information that we maintain about you. We will perform verification before providing you access to this information.

You may note that deletion of certain information or withdrawal of consent may lead to cancellation of your registration with us or your access to our services. Additionally, we may not be able to process your request of correction, updation or deletion, in case the same is not supported by valid documents or data retention if required by the applicable law or law enforcement requests or under any judicial proceedings or it is extremely difficult to implement or risks the privacy of other users.