

# **Privacy**Policy

Classification | Confidential

#### **Disclaimer**

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#### **Table of Contents**

1	II	Introduction5			
2	F	Policy Applicability			
3	Information Collection and Use				
4	Purposes of Personal Information Usage				
5	C	Cookies AND Relevant Technologies	. 6		
	5.1	Cookies	. 6		
	5.2	Web Beacons and Pixel Tags	. 6		
	5.3	Local storage	. 7		
	5.4	Location Information	. 7		
	5.5	Device information	. 7		
6	F	Personal/Biometrics Data Disclosure	. 7		
7	Access Control and Data Protection7				
8	Protection and Retention of Data7				
9	Personal Information of Minors8				
10	)	Third-Party Providers Services	. 8		
11		International Transfer of Personal Information	. 8		
12	)	Policy Adherence	. 8		
13	}	Policy Update	. 8		

Privacy

Version: 0.0

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**Terms** 

Term	Definition
Cryptographic Control	The use of encryption, hashing, digital signatures, and other cryptographic techniques to secure data, communications, and access controls.
Biometric Data	means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allows or confirms the unique identification of that natural person, such as facial images or dactyloscopy data.
Cookies	means small pieces of information that is sent to User's browser along with a web page when the user accesses a Website.
Non-PII	means non-personally identifiable information which is information that cannot be used to identify a particular individual including, without limitation, collection statistical data, such as the numbers of visits to its website
Personal Information	means information which is related to an identified or identifiable natural person.
pixel tag	has the meaning given to it in paragraph 4.2 of this Policy.
Policy	means this privacy policy.
Persistent Cookies	Information stored on a User's device to remember information, settings, preferences, or sign-on credentials that a user has previously saved in previous visits, to create a convenient and faster website experience
Session Cookies	Information stored on User's device during Service session only and get deleted automatically after each visit to the Service. these cookies usually store an anonymous session ID to allow the User to browse a website without having to log in to each page with no collection of any information from User device.





Term	Definition
Strictly Necessary Cookies	Essential and required information for Service operation and effectiveness. Therefore, these cookies cannot be turned off as without them EHC Services cannot be provided. EHCdoes not require the User consent to use these cookies.
Functionality cookies	Information allow EHC Service to remember choices and changes User make (such as the User's name, language, the region or text size, font etc.) and provide enhanced features such as provide the User with updates relevant to the used Services.
Analytical and performance cookies	Information enable EHC to monitor and improve the performance of the Service such as visit counts, traffic source identification and popular items within the Service used by the User.
Personalisation cookies	Information allow EHC to advertise details of products or events that might be of interest to the User. These cookies are persistent as long as User is registered with EHCServices. When the User logs in or returns to EHCService, an advertisement of product or an event will show up based on User's previous visit.
Terms and Conditions	All the terms and conditions under this Policy.
Third Parties	Contractors relating to or affecting the services or products provided by EHC.
web beacon	means the images (often transparent) that are part of Web pages.
Website	means any website owned or operated by EHC
Users	Means any end user accessing EHC's public websites

#### 1 Introduction

Emirates Heritage Club (referred to as EHC or the entity) is dedicated to safeguarding the privacy and personal data of users and third parties utilizing its services. EHC is committed to upholding privacy and ensuring the secure handling of Personal Information, in compliance with all applicable data protection and privacy laws and regulations in the Emirate of Abu Dhabi and the Federal Laws of the United Arab Emirates.

This policy outlines how EHC collects, discloses, and processes Personal Information, including but not limited to user names, addresses, credentials, and/or biometric data, as per business requirements.

## 2 Policy Applicability

This policy applies to all users and third parties who share their personal information with EHC through EHC's websites, mobile applications, products, and services. In cases where users navigate from EHC's website to a third party's website, their personal information becomes subject to the privacy policy of the accessed external site. EHC holds no liability for personal information provided to third-party information gatherers, and users are obligated to adhere to the third party's privacy policies.

#### 3 Information Collection and Use

EHC collects information, including personal information, when users interact with the visited website, use EHC's mobile applications, products, or services. The collected data may include the user's name, gender, job position, Emirates ID, passport, email addresses, phone/mobile numbers, login information, and photos, depending on user interactions, device details and the products or services being utilized.

Users have the right to opt not to disclose personal and biometric data to EHC. However, not providing certain personal information may limit a user's experience or accessibility to some products and services.

## 4 Purposes of Personal Information Usage

Personal information is utilized for various business purposes, including but not limited to:

- Account creation to access EHC services.
- Fulfillment of booking, orders, deliveries, and service requests.
- Marketing and advertising communications.
- Providing a customized user experience.

Version: 0.0 12 January 2024



- Notifying users of updates or upgrades to services.
- Qualification and management of third-party suppliers and business partners.
- Improvement of EHC services through audits, data analysis, and research.
- Troubleshooting reported errors and enhancing user experience.
- Synchronizing, sharing, and storing user-uploaded or downloaded data.
- Compliance with applicable laws, regulations, and EHC policies.
- Biometric data is used for social protection, accessibility to buildings, security, and when required by law.

## 5 Cookies AND Relevant Technologies

Emirates Heritage Club (EHC) and its affiliate entities utilize various technologies, including Cookies, unique identifiers, pixels, and local storage, to collect and store information when users visit and interact with EHC Services. The collected information aids EHC in analyzing traffic to its services.

#### 5.1 Cookies

Privacy

Cookies are small text pieces consisting of unique identifiers, site names, and alphanumeric characters sent to the user's browser or mobile application by the visited service. These Cookies enhance the user experience in subsequent visits to EHC Services by remembering preferences such as privacy settings, language, login and authentication details, device information, and choices. Cookies also help track user interactions to compile aggregated data about site traffic and user behavior.

If Cookies are not used, websites will treat the user as a new visitor every time they load a web page. The user's browser returns Cookie information only to the domain where the Cookie originated, and its content can be retrieved or read only by the server that created the Cookie.

EHC ensures that Cookies are used only for the purposes stated in this Policy. Users have the ability to manage or delete Cookies based on their preferences. Most web browsers provide options to clear all stored Cookies and block Cookies.

### 5.2 Web Beacons and Pixel Tags

In addition to Cookies, EHC may employ other similar technologies, such as web beacons and pixel tags, on its services. For instance, when a user receives an email from EHC web services, it may contain a click-through URL linking to a website. If the user clicks the link, EHC will track their visit to understand preferences for products and services, ultimately improving the user experience. A web beacon is a transparent graphic image embedded in a website or email. Pixel Version: 0.0 224



tags in emails help determine whether an email has been opened. Users can unsubscribe from the EHC mailing list at any time if they prefer not to be tracked in this manner.

### 5.3 Local storage

EHC may collect and store information locally on the user's device through application data caches and browser storage (HTML 5).

#### 5.4 Location Information

EHC may collect information about the user's geographical location using various technologies, including IP address and GPS, to enhance the user experience.

#### 5.5 Device information

EHC collects specific information about the user's device, including hardware model, operating system version, and unique device identifiers, to optimize services for different device configurations.

EHC is committed to ensuring that these technologies are used responsibly and transparently, respecting user preferences and privacy. Users have the ability to manage their Cookie preferences and control the storage of information on their devices.

#### 6 Personal/Biometrics Data Disclosure

EHC may share personal information with third parties to provide services, arrange product shipments, or share information with affiliates, subsidiaries, stakeholders, and government entities as required by law.

### 7 Access Control and Data Protection

Users are responsible for ensuring the accuracy of personal information submitted to EHC. EHC is dedicated to maintaining data accuracy and completeness. Users may request access, updates, corrections, or object to the use of their personal information. Users may also request the deletion of their personal information in compliance with applicable laws.

## 8 Protection and Retention of Data

EHC employs physical, management, and technical measures to protect personal and biometric data from unauthorized access, disclosure, usage, modification, damage, or loss. EHC retains

Privacy Policy

Version: 0.0 12 January 2024



data for periods necessary to fulfill business purposes, legal obligations, and for improving services.

#### 9 Personal Information of Minors

Services intended for adults require parental consent for minors to create a EHC account. EHC will only use or disclose minor's data with explicit consent or when necessary for the minor's protection. EHC will delete a minor's data collected without verified parental consent.

## 10Third-Party Providers Services

EHC services may include content or links to third-party services with their own privacy practices. Users are encouraged to read and understand third-party privacy and data protection policies.

## 11International Transfer of Personal Information

Collected personal information may be processed or accessed in other countries with different data protection laws. EHC ensures compliance with this policy and applicable laws and regulations when processing data in different jurisdictions.

## 12Policy Adherence

Users and third parties accessing and using EHC's services agree to adhere to this policy and any applicable data privacy laws in the United Arab Emirates.

## 13Policy Update

EHC reserves the right to update or change this policy at any time. Material changes will be notified through posting on services or direct email notifications.

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