

## PRIVACY POLICY

Dubai

This Privacy Policy for personal data (hereinafter - Privacy Policy) applies to all information that Villa Suksan, located at the domain name

<https://www.facebook.com/wawirealestate> , may receive about the User during the use of the Internet store website, programs, and products of the Internet store.

### DEFINITION OF TERMS

1.1. In this Privacy Policy, the following terms are used:

1.1.1. "Site Administration of the Internet store (hereinafter referred to as the Site Administration)" - authorized employees in charge of managing the site, acting on behalf of the Organization Name, who organize and/or carry out the processing of personal data, as well as determine the purposes of processing personal data, the composition of personal data subject to processing, actions (operations) performed with personal data.

1.1.2. "Personal data" - any information related to directly or indirectly identified or identifiable individuals (personal data subjects).

1.1.3. "Processing of personal data" - any action (operation) or set of actions (operations) performed using automation tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

1.1.4. "Confidentiality of personal data" - a requirement mandatory for compliance by the Operator or any other person who has access to personal data not to allow their distribution without the consent of the subject of personal data or the presence of other legal grounds.

1.1.5. "User of the Internet store website (hereinafter - User)" - a person who has access to the Site through the Internet and uses the Internet store website.

1.1.6. Cookies: A small piece of data sent by a web server and stored on a user's computer, which the web client or web browser sends to the web server in an HTTP request when trying to open a page of the corresponding site.

1.1.7. IP address: A unique network address of a node in a computer network built on the IP protocol.

### 2. GENERAL PROVISIONS

2.1. The use of the Internet store website by the User implies agreement with this Privacy Policy and the conditions for the processing of User's personal data.

2.2. In case of disagreement with the terms of the Privacy Policy, the User must stop using the Internet store website.

2.3. This Privacy Policy applies only to the Internet store website. The Internet store does not control and is not responsible for third-party sites that the User may visit by following the links available on the Internet store website.

2.4. The Site Administration does not verify the accuracy of personal data provided by the User of the Internet store website.

### 3. SUBJECT OF THE PRIVACY POLICY

3.1. This Privacy Policy establishes the obligations of the Site Administration of the Internet store to non-disclosure and ensuring the confidentiality regime for the personal data that the User provides at the request of the Site Administration when registering on the Internet store website or when placing an order to purchase the Product.

3.2. Personal data permitted for processing under this Privacy Policy is provided by the User by filling out the registration form on the Internet store website and includes the following information:

- Full name of the User;
- User's contact phone number;
- User's email address (e-mail);
- Delivery address of the Product;
- User's place of residence.
- 3.3. The Internet store protects the Data that is automatically transmitted in the process of viewing ad units and when visiting pages on which the statistical script of the system is installed ("pixel"):
  - IP address;
  - Information from cookies;
  - Information about the browser (or other program that provides access to displaying ads);
  - Access time;
  - Page address where the ad unit is located;
  - Referrer (address of the previous page).

3.3.1. Disabling cookies may result in the inability to access parts of the Internet store website that require authorization.

3.3.2. The Internet store collects statistics on IP addresses of its visitors. This information is used to identify and solve technical problems, to control the legality of financial payments.

- 3.4. Any other personal information not specified above (purchase history, browsers and operating systems used, etc.) is reliably stored and not distributed, except as provided in clauses 5.2. and 5.3. of this Privacy Policy.

#### 4. PURPOSES OF USER PERSONAL INFORMATION COLLECTION

4.1. The Site Administration of the Internet store may use the User's personal data for the following purposes:

4.1.1. Identifying the User registered on the Internet store website to place an order and/or conclude a remote purchase and sale agreement with the *Store Name*.

4.1.2. Providing the User with access to personalized resources of the Internet store website.

4.1.3. Establishing feedback with the User, including sending notifications, inquiries regarding the use of the Internet store website, providing services, processing User requests and applications.

4.1.4. Determining the User's location to ensure security and prevent fraud.

4.1.5. Confirming the authenticity and completeness of the personal data provided by the User.

4.1.6. Creating an account for the User to make purchases if the User has consented to the creation of an account.

4.1.7. Notifying the User of the Internet store website about the status of the order.

4.1.8. Processing and receiving payments, confirming taxes or tax benefits, challenging payments, determining the User's right to receive a credit line.

4.1.9. Providing the User with effective customer and technical support in case of problems related to the use of the Internet store website.

4.1.10. Providing the User, with their consent, with updates on products, special offers, price information, newsletters, and other information on behalf of the Internet store or its partners.

4.1.11. Conducting advertising activities with the User's consent.

4.1.12. Providing the User with access to websites or services of Internet store partners for the purpose of obtaining products, updates, and services.

## 5. METHODS AND TERMS OF PERSONAL INFORMATION PROCESSING

5.1. The processing of the User's personal data is carried out without any time limitations, by any legal means, including in information systems of personal data using automation tools or without using such tools.

5.2. The User agrees that the Site Administration has the right to transfer personal data to third parties, in particular, courier services, postal organizations, telecommunications operators, solely for the purpose of fulfilling the User's order placed on the Internet store website "Store Name," including the delivery of the Product.

5.3. Personal data of the User may be transferred to authorized government authorities of the Russian Federation only on the grounds and in the manner established by the legislation of the Russian Federation.

5.4. In case of loss or disclosure of personal data, the Site Administration informs the User about the loss or disclosure of personal data.

5.5. The Site Administration takes the necessary organizational and technical measures to protect the User's personal information from unauthorized or accidental access, destruction, alteration, blocking, copying, distribution, as well as from other illegal actions of third parties.

5.6. The Site Administration, together with the User, takes all necessary measures to prevent losses or other negative consequences caused by the loss or disclosure of the User's personal data.

## 6. OBLIGATIONS OF THE PARTIES

6.1. The User shall:

6.1.1. Provide information on personal data necessary for using the Internet store website.

6.1.2. Update and supplement the provided information on personal data in case of any changes.

6.2. The Site Administration shall:

6.2.1. Use the received information exclusively for the purposes specified in clause 4 of this Privacy Policy.

6.2.2. Ensure the confidentiality of the information, not disclosing it without the prior written permission of the User, as well as not selling, exchanging, publishing, or otherwise disclosing the transferred personal data, except for clauses 5.2. and 5.3. of this Privacy Policy.

6.2.3. Take precautions to protect the confidentiality of the User's personal data in accordance with the procedure commonly used to protect such information in the existing business turnover.

6.2.4. Block personal data related to the respective User from the moment of the User's request or request of their legal representative or authorized body for the protection of the rights of personal data subjects for the period of verification in case of inaccurate personal data or illegal actions being detected.

## 7. LIABILITY OF THE PARTIES

7.1. The Site Administration that has not fulfilled its obligations is responsible for losses incurred by the User due to the unauthorized use of personal data, in accordance with the legislation of the Russian Federation, except for cases stipulated in clauses 5.2., 5.3., and 7.2. of this Privacy Policy.

7.2. In case of loss or disclosure of Confidential Information, the Site Administration is not responsible if this confidential information:

7.2.1. Became public domain before its loss or disclosure.

7.2.2. Was obtained from a third party before it was received by the Site Administration.

7.2.3. Was disclosed with the User's consent.

## 8. DISPUTE RESOLUTION

8.1. Before going to court with a claim arising from the relations between the User of the Internet store website and the Site Administration, it is mandatory to submit a claim (a written proposal for a voluntary settlement of the dispute).

8.2. The recipient of the claim within 30 calendar days from the date of receiving the claim informs the claimant in writing about the results of the consideration of the claim.

8.3. In case of failure to reach an agreement, the dispute will be referred to a court in accordance with the current legislation of the Russian Federation.

8.4. This Privacy Policy and the relationship between the User and the Site Administration are governed by the current legislation of the Russian Federation.

## 9. ADDITIONAL TERMS

9.1. The Site Administration has the right to make changes to this Privacy Policy without the User's consent.

9.2. The new Privacy Policy comes into effect from the moment it is posted on the Internet store website if not otherwise provided by the new version of the Privacy Policy.

9.3. All suggestions or questions about this Privacy Policy should be reported to  
[indicate the section of the Internet store website].

9.4. The current Privacy Policy is posted on the page at <https://wawirealestate.com/>

Updated on October 10, 2022.