

# **PRIVACY POLICY**

Effective Date: 01 September 2025

## **1. Introduction and Legal Basis**

ONE X AFFILIATE MARKETING SERVICES L.L.C (“Company”, “we”, “our”, or “us”), a limited liability company duly incorporated under the laws of the United Arab Emirates, having its principal office in Dubai, UAE, is committed to protecting the privacy, confidentiality, and security of personal information entrusted to us by users, affiliates, customers, partners, and visitors (“you” or “data subjects”).

This Privacy Policy (“Policy”) sets out how we collect, process, store, use, disclose, transfer, and protect your personal information in compliance with:

- Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (PDPL);
- Cabinet Decision No. 32 of 2022 regarding the Executive Regulations of the PDPL;
- Federal Decree-Law No. 34 of 2021 on Combating Rumors and Cybercrimes;
- and relevant international data protection standards such as the EU GDPR.

This Policy applies to all interactions with ONE X Affiliate Marketing Services L.L.C, including the use of our websites, digital platforms, mobile applications, affiliate programs, promotional activities, events, and any other services offered by us (collectively referred to as the “Services”).

By accessing or using our Services, you consent to the terms and practices described in this Policy.

## **2. Definitions**

For the purposes of this Policy:

- “Personal Data” means any information relating to an identified or identifiable natural person.
- “Processing” refers to any operation performed on personal data, including collection, storage, use, disclosure, or deletion.
- “Controller” means the entity which determines the purposes and means of processing personal data (i.e., ONE X Affiliate Marketing Services L.L.C).
- “Processor” means a third party that processes personal data on behalf of the Controller.
- “Data Subject” means any individual whose personal data is processed by us.
- “Consent” means any clear, affirmative act by which the data subject agrees to the processing of their personal data.

## **3. Categories of Data We Collect**

We may collect and process the following categories of data, depending on your interactions with our Services:

### **(a) Personal Identification Data**

- Full name, gender, date of birth, nationality, and country of residence
- Emirates ID or passport number (where required for verification or contractual purposes)
- Signature and scanned copies of official identification (for regulated transactions)

### **(b) Contact and Communication Data**

- Email address, mobile number, and address
- Communication preferences and correspondence history

- Information shared through forms, surveys, or customer support channels

(c) Transactional and Financial Data

- Payment card details (processed securely through PCI-DSS compliant gateways)
- Billing information, payment history, and transaction records
- Bank account details (if required for commission or refund purposes)

(d) Professional and Business Data

- Company name, trade license number (for affiliates or partners)
- Position, employment information, and referral or affiliate ID

(e) Technical and Usage Data

- IP address, browser type, operating system, and device identifiers
- Access logs, session duration, navigation patterns, and referral URLs
- Cookies, web beacons, and usage analytics

(f) Marketing and Preference Data

- Responses to marketing campaigns or surveys
- Interests, preferences, and demographic information
- Data regarding event participation, offers, or promotions

#### 4. Legal Basis for Processing

We process personal data only under lawful bases as defined by UAE PDPL and GDPR principles, including:

1. Consent: When you voluntarily agree to data collection (e.g., newsletter subscriptions, marketing campaigns).
2. Contractual Necessity: When processing is necessary to fulfill a contractual obligation (e.g., affiliate agreements, payment settlements).
3. Legal Obligation: When required by UAE regulatory authorities, tax agencies, or judicial orders.
4. Legitimate Interests: To improve service quality, maintain network security, prevent fraud, and conduct lawful business operations.
5. Vital Interests: To protect your safety, rights, or property when legally necessary.

#### 5. Purpose of Data Processing

We process personal information for the following purposes:

- To provide and maintain our Services, process bookings, and manage transactions;
- To verify user identity and ensure the security of accounts;
- To facilitate participation in affiliate marketing programs;
- To issue invoices, process payments, and perform financial reconciliations;
- To send confirmations, updates, and administrative notifications;
- To deliver promotional content, offers, and marketing materials (only upon consent);
- To improve our website functionality and customer experience through analytics;
- To comply with applicable legal, financial, and regulatory requirements;
- To investigate and prevent potential fraudulent or unlawful activity;
- To maintain business continuity and audit trails for legitimate business operations.

## **6. Data Sharing and Disclosure**

We do not sell, lease, or trade personal data.

However, we may disclose personal data under the following lawful circumstances:

### **(a) Service Providers and Processors**

We may engage third-party providers for hosting, analytics, payment processing, cloud storage, marketing, or customer support.

All such processors operate under legally binding confidentiality and data protection agreements consistent with UAE PDPL standards.

### **(b) Legal and Regulatory Authorities**

We may disclose information to law enforcement, courts, or government bodies when legally required under UAE Federal Laws, including to prevent fraud, comply with sanctions, or protect public safety.

### **(c) Corporate Transactions**

In case of merger, acquisition, restructuring, or asset transfer, personal data may be shared or transferred as part of the business transaction, subject to confidentiality protections.

## **7. International Data Transfers**

We may transfer your personal data to servers or partners located in jurisdictions outside your country of residence, including but not limited to the United Arab Emirates, Canada, India, Singapore, or the European Union.

Such transfers are conducted in compliance with Articles 22–24 of the UAE PDPL, ensuring that:

- Adequate levels of data protection are maintained in the destination country; or
- Standard contractual clauses or equivalent legal safeguards are in place.

## **8. Data Retention and Deletion**

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected, or as required by law, including tax, accounting, and compliance requirements.

Upon expiration of the retention period, data is securely deleted, anonymized, or archived in accordance with UAE data retention regulations.

You may request deletion or restriction of your personal data at any time, subject to legal and contractual limitations.

## **9. Data Security Measures**

To protect your personal data, we implement strict technical, administrative, and physical safeguards, including but not limited to:

- SSL/TLS encryption for data transmission
- Access control and multi-factor authentication
- Encrypted data storage and firewalls
- Regular vulnerability testing and system audits

- Employee confidentiality agreements and cybersecurity training

Despite these measures, electronic communications and online storage may carry inherent risks. While we take all reasonable precautions, we cannot guarantee absolute protection against unauthorized access or misuse.

## **10. Cookies and Tracking Technologies**

We use cookies and similar technologies to:

- Enable essential site functionality and secure login sessions;
- Analyze website traffic and usage behavior;
- Personalize content and advertisements;
- Measure marketing effectiveness.

You may disable cookies in your browser settings; however, certain features of our Services may not function properly without them.

## **11. Your Rights as a Data Subject**

Under Articles 13–18 of the UAE PDPL, you have the following rights:

1. Right to Access – To obtain confirmation of whether we hold your data and request a copy.
2. Right to Rectification – To correct inaccurate or incomplete personal data.
3. Right to Erasure – To request deletion of personal data under lawful grounds.
4. Right to Restriction – To limit processing under certain conditions.
5. Right to Data Portability – To receive your data in a structured, machine-readable format.
6. Right to Object – To object to direct marketing or processing based on legitimate interest.
7. Right to Withdraw Consent – To withdraw consent at any time, without affecting prior lawful processing.
8. Right to Complaint – To file a complaint with the UAE Data Office if you believe your data rights have been infringed.

Requests may be submitted via email at [info@onexproperty.com](mailto:info@onexproperty.com).

We will respond within 30 calendar days in accordance with UAE PDPL requirements.

## **12. Children's Data**

Our Services are intended for individuals aged 18 years and above.

We do not knowingly collect personal data from minors. If we become aware that data from a child has been collected without verified parental consent, it will be deleted immediately.

## **13. Amendments to This Policy**

The Company reserves the right to amend or update this Privacy Policy periodically to reflect legal developments, regulatory guidance, or business practice changes.

All updates will be posted on our website with a revised "Effective Date."

Continued use of our Services after the publication of updates constitutes your acceptance of the revised terms.

#### **14. Contact and Data Protection Officer (DPO)**

For inquiries, requests, or complaints regarding data protection, please contact:

Data Protection Officer (DPO)

ONE X AFFILIATE MARKETING SERVICES L.L.C

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