

Privacy policy

The Personal Data Processing and Protection Policy (hereinafter, the Policy) applies to the information that DIGITAL BUSINESS SOLUTIONS — FZCO (hereinafter, the Company) receives about the subject of personal data during his use of the <https://axirum.com/> website (hereinafter, the Website), products or services of the Company.

1. General terms

1.1. The Policy determines the stance of the Company on processing of personal data and declares general terms of personal data processing.

1.2. The purpose of this Policy is to ensure safety of rights and freedoms of the subject while processing his or her personal data.

1.3. The Policy has been created in accordance with the legislation of the United Arab Emirates.

2. Personal data processing

2.1. Within the framework of this Policy, the Company processes the following data about the subject:

2.1.1. Personal data provided by the subject:

- surname and given name;
- e-mail/postal address;
- phone number;
- information about the current place of work and position;
- data on claims, complaints and other appeals of the subject sent using the Website;
- other information stipulated in the consent to personal data processing.

2.1.2. Subject's data automatically transmitted to the Company, such as IP address, date and time of access to the Website, addresses of the requested pages, cookie data necessary for the Website's quality operation.

2.2. The Company processes the personal data for the purposes of:

- Organizing and carrying out loyalty programs, marketing and/or sales promotion, researches, surveys and other events by the Company (as well as with the involvement of third parties).
- Performing obligations within contracts concerning supply of products, execution of events and provision of other services to the subjects by the Company.
- Promotion of the Company's and/or its partner's services and/or goods in the market by directly contacting the Company's clients using different means of communication, including but not limited to phone, e-mail, post, the Internet, etc.
- Functioning of the Company's Website and its improvement.
- Receiving feedback from the subjects including processing their requests and appeals and informing them about the Website's operation.
- Creation of reference materials for internal information support of the Company, its subsidiaries and representative offices.

- Execution of rights and legitimate interests of the Company within business activities provided by the local legal acts of the Company, or execution of rights and legitimate interests of third parties. Achievement of socially significant purposes.
- Other purposes that are stipulated in the consent to personal data processing, the contract between the Company and the subject, as well as the applicable legislation.

2.3. The list of actions performed by the Company with personal data includes collection, systematization, accumulation, storage, clarification (updating, modification), use, distribution (including transfer), depersonalization, blocking, destruction, as well as the implementation of any other actions in accordance with the current legislation.

2.4. Processing of personal data is carried out in the following manner:

- manual processing of personal data;
- automated processing of personal data with the transfer of received information through information and telecommunications networks if such information exists;
- mixed processing of personal data.

3. Conditions for processing personal information of the subjects and its transfer to third parties

3.1. The processing of personal data is carried out by the Company on condition of obtaining the consent of the subject, with the exception of cases established by the applicable law in which the processing of personal data can be carried out without such consent.

3.2. The subject of personal data may express his consent by performing actions, affixing appropriate marks, filling out forms posted on the Website, or in written form in accordance with the legislation.

3.3. The confidentiality of all personal information of the subject is maintained and its security is ensured.

3.4. The Company has the right to transfer the subject's personal information and/or entrust its processing to third parties in the following cases:

- the subject has consented to such actions;
- the transfer is necessary for the execution of the contract with the subject;
- in order to ensure the possibility of protecting the rights and legitimate interests of the Company;
- in other cases established by law.

3.5. The Website may contain links to other sites that are not operated by the Company. If the subject follows the link, he will get to the site of a third party. The Company strongly recommends that the subject familiarize himself with the privacy policy on each site he or she visits. The Company does not control and assumes no responsibility for the content, privacy policy or actions of third-party sites or third-party services.

3.6. The terms of personal data processing are established taking into account:

- determined purposes of personal data processing;
- validity period of contracts with the subjects and the consent of the subjects to the processing of their personal data;
- applicable legislation.

3.7. Personal data that is being processed shall be destroyed or depersonalized upon achieving the processing goals or in case of loss of need to achieve these goals, unless otherwise provided by law.

3.8. Personal data that is being processed shall be deleted or depersonalized in the following cases:

- if the purposes of the personal data processing or critical storage time were achieved;
- if it is no longer necessary to process personal data;
- if the subject or his or her official representative confirmed that personal data was received illegally, or it is not necessary for the purpose of personal data processing;
- if it is impossible to ensure the legitimacy of processing personal data;
- if the subject revoked the consent for the personal data processing and it is not required to store personal data for the declared purpose anymore;
- if the subject revoked the consent to use personal data for promoting goods and services to potential clients;
- if the period of limitation of legal arrangements within which personal data is processed or was processed has expired;
- if the Company is liquidated (reorganized).

3.9. The Company shall take all necessary legal, organizational and technical measures to ensure safety of personal data, to protect it from unauthorized access (including accidental one), destruction, modification, access denial and other unauthorized actions. Particularly, the Company shall:

- appoint employees responsible for protection and organization of processing of personal data;
- check if contracts include sections on ensuring confidentiality of personal data; include such sections into contracts if necessary;
- issue local acts on processing of personal data, acquaint employees with these acts, train users;
- ensure physical safety of premises and processing tools, access control, security, CCTV monitoring;
- restrict and control access of employees and other individuals to personal data and tools designed to process it; monitor actions performed on personal data;
- determine threats to security of personal data that may occur during the processing; create threat models based on these threats;
- use security tools (antivirus tools, firewalls, unauthorized access protection tools, data cryptographic protection facilities), including those that have gone through the compliance assessment in accordance with the established procedure;
- back up data to be able to restore it;
- exercise internal control over the established order, make sure the initiated measures are effective, and react to incidents.

4. Rights and obligations of the subjects

4.1. The Company does not verify the accuracy of the personal data provided by the subjects.

4.2. In case of change of personal data, the subject shall notify the Company in written form within 14 days. The Company is entitled to request additional information and documents confirming its authenticity from the subject.

4.3. The subject is entitled to receive information concerning the processing of his or her personal data, including, but not limited to:

- confirming the fact of processing of personal data by the Company;
- legal basis and purpose of personal data processing;
- purposes and methods of personal data processing used by the Company;
- name and location of the Company, information about individuals (except for employees of the Company) who have access to personal data or to whom personal data may be disclosed based on a contract with the Company or based on the law;
- personal data that is being processed and that concerns the corresponding subject; the origin of this data, unless another procedure for granting of such data is provided for by the law;
- procedure for the execution of rights provided for by the legislation;
- information about the transferring of data abroad that took place or may potentially take place in the future.

4.4. The subject is entitled to demand that the Company clarifies his or her personal data, blocks or destroys it in case the personal data is incomplete, obsolete or inaccurate, illegally obtained or is not necessary for the claimed processing purpose. The subject is also entitled to take steps to protect his or her rights as prescribed by law.

4.6. If the subject believes that the Company processes his or her personal data in contravention of the legislation or otherwise infringes on his or her rights and freedoms, the subject is entitled to appeal against actions or inactions of the Company in a judicial procedure.

4.7. The subject is entitled to protect his or her rights and legitimate interests, including the reimbursement of damages and (or) compensation for psychological trauma in a judicial procedure.

5. Rights and obligations of the company

5.1. The Company is entitled to delegate the processing of personal data to another person through the contract concluded with this person and with the consent from the subject. The contract shall contain the list of actions (operations) on personal data that will be performed by the person processing the personal data, the purposes of processing, the obligation of this person to respect confidentiality of personal data and ensure safety of personal data during the processing, and also the requirements to the protection of personal data according to the applicable legislation.

5.2. For the purposes of internal information management, and with the written consent from the subject, unless otherwise provided for by the legislation, the Company can create internal reference materials that may include surname and given name of the subject, his or her place of employment, position, date and place of birth, address, email and other personal data received from the subject.

5.3. The Company is entitled to process personal data without the consent of the subject in the cases provided for by the applicable legal acts.

5.4. The Company is entitled to refuse to fulfill a request of the subject to receive information concerning the processing of his or her personal data in the cases provided for by the applicable legal acts.

6. Additional provisions

6.1. The current Policy is posted on the Website. The Company has the right to make changes to the Policy. The Company informs the subject of the Policy change by posting a new version on the Website. By continuing to use the Website after posting of the new version, the subject agrees to the new version of the Policy.

6.2. The new Policy comes into force from the moment it is posted on the Company's Website, unless otherwise provided by the new version of the Policy.

6.3. If the subject has any questions about the Policy, he can contact the Company using the contact details provided on the Website.

6.4. In case of questions and complaints from the subject, he or she shall contact the Company by any means available. The parties shall endeavor to resolve any arising disputes through negotiations. If not resolved through negotiations, the dispute shall be submitted to a judicial authority in accordance with the current legislation.

Do you have any questions left? Contact us:

By phone: +971 050 447 36 25

By email: office@axirum.com