

## Oman Avenues Mall App Privacy Policy

This Oman Avenues Mall App Privacy Policy (the "Policy") describes how Oman Avenues Mall (the "Mall", "we, or "us") collects, processes, uses and discloses the members of Oman Avenues Mall App ("members", or you") personal information as a data controller, when you contact us, use our services or interact with our platforms including websites and mobile apps (together "Platforms").

## WHAT THIS POLICY COVERS

We are committed to adopting the highest standards when it comes to how we collect, use and protect your personal information, and have accordingly developed this Policy, which:

- sets out the types of personal information we collect;
- explains how and why we collect and use your personal information;
- explains when and why we may share personal information within the Mall, including its parent and associated companies, and with other organizations;
- explains how we protect the personal information we collect; and
- explains the rights and choices you have in relation to your personal information you shared with us.

This Policy applies if you use our services (referred to in this Policy as "our Services"). Using our Services means:

- Buying / Ordering services or products from any of our subsidiaries over the phone, in store, or online
- Using any of our platforms, including websites ("our Websites"), public Wi-Fi networks, or mobile applications ("our Mobile Apps"); or
- Being a member of any of our loyalty schemes (e.g. Maxi Club)
- Taking part in our promotions & competitions and registering to receive our newsletters and offers

This Policy also applies if you contact us or we contact you about our Services.

## PERSONAL INFORMATION WE COLLECT

### When you register with us, we may collect:

- Your personal details, including your postal and billing addresses, email address(es), phone number(s), date of birth, gender, and passport or ID number
- Your account login details, such as your username and the password (encrypted) that you have chosen; and
- Your interests, preferences, income, and other profiling information.

When you shop with us online, browse our Websites, use our Mobile Apps, or connect to Wi-Fi networks we provide, we may collect:

- Information about your online purchases (for example: what, when, where you ordered / bought and how you paid);
- Information about your online browsing behavior on our Websites, Mobile Apps and public networks and information about when you click on any of our advertisements (including those shown on third party websites);
- Information about devices you have used to access our Services (including the make, model and operating system, IP address, browser type and mobile device identifiers); and
- Information about your precise geolocation.

When you use any of our loyalty program(s) to shop with us, we may collect:

- Transaction information, including the in-store and online purchases you earn points for and how you use your points, coupons, and vouchers within our subsidiaries or with other partners.

When you contact us or we contact you or you take part in promotions, competitions, surveys or questionnaires about our Services, we may collect:

- Personal information you provide about yourself;
- Details of emails and other digital communications we send to you including information about the emails you open and links in them that you click on; and
- Your feedback and contributions to customer surveys and questionnaires.

## Other sources of personal information

We may also use personal information from other sources, such as specialist companies that supply information, online media channels, our partners and public registers. We may collect the following types of personal information about you from other sources: contact details, credit history, purchases, interests, preferences, or other types of publicly available information. This other personal information helps us to:

- review and improve the accuracy of the data we hold; and
- improve and measure the effectiveness of our marketing communications, including online advertising.

We may be required by law to collect personal information about you or as a consequence of any contractual relationship we have with you.

If you choose not to provide your personal information to be used in accordance with this Policy, we reserve the right to deny you visiting our Platform or allow to visit our Platforms conditionally and accordingly, you may not be able to access certain options, products or services, and in some cases, we may not be able to fulfil a service you request.

## WHY AND HOW WE USE YOUR PERSONAL INFORMATION

### Make our Services available to you

We use your personal information to assess our provision of the services you have requested, including:

- Processing your orders and refunds; and
- Managing the accounts you hold with us.
  
- This is so we can provide the services to you in line with our contractual obligations to you.

### Personalize your experience

We may use your personal information to personalize the marketing messages we send to you and to make them more relevant and interesting, as this is in our legitimate business interests. We may use your personal information for this purpose in the following ways:

- Using your online browsing behavior as well as your in-store and online purchases to help us better understand you as a customer and provide you with personalized offers and services;
- Providing you with relevant marketing communications (including by email, post, telephone, SMS, or online advertising), relating to products and services we offer, and those of our suppliers and partners. As part of this, online advertising may be displayed on Our Websites and on other organizations' websites and online media channels. We may also measure the effectiveness of our marketing communications and those of our suppliers and partners.

To help us to better understand you and provide you with services and marketing communications, that are relevant to your interests, we combine personal information we collect when you make purchases in-store with personal information collected from our Websites, Mobile Apps and other sources.

### Contact and interact with you

We may use your personal information when we communicate with you, in order to:

- Contact you about our Services, for example by phone, email or post or by responding to social media posts that you have directed at us;
- Manage promotions and competitions you take part in, including those we run with our suppliers and partners;
- Invite you to take part in and manage customer surveys, questionnaires and other market research activities carried out by Oman Avenues Mall and by other organizations on our behalf.

It is in our legitimate business interests that we are able to provide you with appropriate responses and provide you with notice about our services.

## Manage and improve our day-to-day operations

We analyze information about how you use our services to:

- Manage and improve our Websites and Mobile Apps;
- Help to develop and improve our product range, services, stores, information technology systems, know-how and the way we communicate with you;
- Detect and prevent fraud or other crimes.

It is in our legitimate business interests to use the information provided to us for this purpose, so we can understand any issues with our Services to improve it.

## SHARING PERSONAL INFORMATION

We may share your personal information with third parties under the following circumstances:

### Retail Partners

We may share your personal information with other companies that sell products through our Services ("Retail Partners"). We only share information that enables our Retail Partners to provide their services. For example, when you shop online or in-store we will give the relevant Retail Partner your name, contact details, and address and details of the purchase so that they can deliver your items.

### Service Providers

We work with carefully selected Service Providers that carry out certain functions on our behalf. These include, for example, companies that help us with technology services, storing and combining data, processing payments and delivering orders. We only share information that enables our Service Providers to provide their services.

Some of the Service Providers we work with operate online media channels, and they place relevant online advertising for our products and services, as well as those of our suppliers and our Retail Partners, on those online media channels on our behalf. For example, you may see an advert for our products and services when you use a particular social media site.

## SHARING PERSONAL INFORMATION WITH OTHER ORGANISATIONS

We may share personal information with other organizations in the following circumstances:

- if any applicable law or a public authority requires us to share the personal information;
- if we need to share personal information in order to establish, exercise or defend our legal rights (this includes providing personal information to others for the purposes of preventing fraud and reducing credit risk);
- to an organization we sell or transfer (or enter into negotiations to sell or transfer) any of our businesses or any of our rights or obligations under any agreement we may have with you. If the transfer or sale goes ahead, the organization receiving your personal information can use your personal information in the same way as us;
- to any other successors in title to our business; or
- to anyone to whom we transfer or may transfer our rights and duties.

## TRANSFER OF YOUR PERSONAL INFORMATION

Your personal information may be transferred to, stored, and processed in a country that is different from your country of residence or our country of incorporation. In any case, we have put in place appropriate safeguards in accordance with applicable legal requirements to ensure that your data is adequately protected.

In the event your personal information is transferred to a foreign jurisdiction, it may be subject to the laws of that jurisdiction and we may be required to disclose it to the courts, law enforcement or governmental authorities in those jurisdictions but we will only do so where required by applicable laws.

## HOW WE PROTECT PERSONAL INFORMATION

We maintain physical, technical, and organizational safeguards to secure your personal information from unauthorized access, use, alteration and destruction. However, no internet-based site can be 100% secure and we cannot be held responsible for unauthorized or unintended access that is beyond our control.

## SOCIAL MEDIA

We operate channels, pages and accounts on some social media sites to inform, assist and engage with customers. We monitor and record comments and posts made on these channels about us so that we can improve our services.

Oman Avenues Mall is not responsible for any information posted on those sites other than information we have posted ourselves. We do not endorse the social media sites themselves or any information posted on them by third parties.

## RETENTION

We keep records for as long as required to a) manage purchases, bookings, memberships and provide the other relevant products or services anticipated by this Privacy Policy, including keeping you up-to-date with our marketing b) personalize the products, services and communications with you c) comply with the applicable record retention legal requirements. When deciding how long to keep your personal information after our relationship with you has ended, we take into account our legal obligations and regulators' expectations. This does not mean that we are obliged to retain the records in all cases, rather, we reserve the right to delete, reduce or truncate, any records we have, in our sole discretion and without any notice.

If you wish to request that we no longer use your information to provide you services, contact us at, Oman Avenues Mall Management Office, Sultanate of Oman . You can also email us at [info@omanavenuesmall.com](mailto:info@omanavenuesmall.com). However, we will retain and use your registration information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## MARKETING COMMUNICATIONS

All marketing communications we send to you will provide you with a way to withdraw your consent to future marketing. If you no longer wish to receive promotional materials you may opt-out from receiving these communications or change your account settings, this will remove you from marketing lists.

Please note that if you unsubscribe from marketing communications you will still receive operational and service messages from us regarding the services or products you bought from us and responses to enquiries made to us, and that we may hold your details on a suppression list so we don't send you marketing communications in the future.

## COOKIES AND SIMILAR TECHNOLOGIES

We use cookies and similar technologies, such as tags and pixels ("Cookies"), to personalize and improve your customer experience as you use our Websites and Mobile Apps and to provide you with relevant online advertising. Cookies are small data files that allow a website or Mobile App to collect and store a range of data on your desktop computer, laptop or mobile device.

Cookies help us to provide important features and functionality on our Websites and Mobile Apps, and we use them to improve your customer experience. For example, we use Cookies to do the following:

### Improve the way our Websites and Mobile Apps work

Cookies allow us to improve the way our Websites and Mobile Apps work so that we can personalize your experience and allow you to use many of their useful features.

For example, we use Cookies so we can remember your preferences and the contents of your shopping basket when you return to our Websites and Mobile Apps.

## Improve the performance of our Websites and Mobile Apps

Cookies can help us to understand how our Websites and Mobile Apps are being used, for example, by telling us if you get an error messages as you browse. These Cookies normally collect data that is mostly aggregated and anonymous.

## Deliver relevant online advertising

We use Cookies to help us deliver online advertising that we believe is most relevant to you on our Websites and other organizations' websites.

Cookies used for this purpose are often placed on our Websites by other organizations, and always with our permission. These Cookies may collect information about your online behavior, such as your IP address, the website you arrived from and information about your purchase history or the content of your shopping basket. This means that you may see our adverts on our Websites and on other organizations' websites. You may also see adverts for other organizations on our Websites.

To help us to deliver online advertising that is relevant to you, we may also combine data we collect through Cookies in the browser of your desktop computer or other devices with other data that we have collected (e.g. Loyalty program).

## Measuring the effectiveness of our marketing communications, including online advertising

Cookies can tell us if you have seen a specific advert, and how long it has been since you have seen it. This information allows us to measure the effectiveness of our online advertising campaigns and control the number of times you are shown an advert.

We also use Cookies to measure the effectiveness of our marketing communications, for example by telling us if you have opened a marketing email that we have sent you.

## Your choices when it comes to Cookies

You can use your browser settings to accept or reject new Cookies and to delete existing Cookies. You can also set your browser to notify you each time new Cookies are placed on your computer or other device.

If you choose to disable some or all Cookies, you may not be able to make full use of our Platforms. For example, you may not be able to add items to your shopping basket, proceed to checkout, or use some of our products and services that require you to sign in.

Once you have given us your consent to the use of cookies, we shall store cookies on your computer or device. If you wish to withdraw your consent at any time, you will need to delete our cookies using your internet browser settings.

## AGGREGATE DATA, DATA ANALYTICS AND SOCIAL MEDIA FUNCTIONALITY

We may aggregate personal information and remove any identifying elements in order to analyze patterns and improve our marketing and promotional efforts, to analyze Platform use, to improve our content and product offerings, and to customize our Platforms' content, layout, products and services, and we may appoint third parties to do this on our behalf, as set out above.

We gather certain usage information like the number and frequency of visitors to our Platforms. This information may include which webpage you just came from, which webpage you next go to, what browser you are using, your device and your IP address. We normally use such data in the aggregate. This collective data helps us to determine how much our customers use parts of our Platforms, and do research on our users' demographics, interests, and behavior to better understand and serve you.

If you use buttons on our Platforms linked to social media or similar sites (for example "Like" and/or "Share" buttons), content from our Platforms may be sent back to that other website or service and, depending on your privacy settings, may be privately or publicly visible (for example to friends, followers, or generally to anyone who has access to your profile page).

## YOUR RIGHTS

You have the right to see or access the personal information we hold about you. To receive a copy, please write to us at [info@omanavenuesmall.com](mailto:info@omanavenuesmall.com)

In addition, you have certain rights regarding your personal information, subject to local law. These include the following rights to:

- rectify the information we hold about you;
- restrict our use of your personal information;
- withdraw any consents you have provided for our use of your personal information;
- receive your personal information in a usable electronic format and transmit it to a third party (right to data portability); and

If you would like to discuss or exercise such rights, please contact us at [info@omanavenuesmall.com](mailto:info@omanavenuesmall.com).

If you are concerned that any of the information we hold about you is incorrect, or out of date, please write to the address above to report your concerns and we will take appropriate steps to amend our records.

Please note that we will likely require additional information from you in order to honor your requests.

## PRIVACY CONCERNS

If you have any concerns about our compliance with applicable privacy laws or this Privacy Policy please write to us at [info@omanavenuesmall.com](mailto:info@omanavenuesmall.com). We will endeavor to respond to your concerns as soon as possible.

## NOTIFICATION OF CHANGES TO THIS PRIVACY POLICY

We update this Privacy Policy when needed and place updates on our platforms. All changes will become effective when posted unless indicated otherwise. Please review this Privacy Policy periodically for changes.

## LINKS

Our Websites or Mobile Apps may contain links to other websites operated by other organizations that have their own privacy policies. Please make sure you read the terms and conditions and privacy policy carefully before providing any personal information on a website as we do not accept any responsibility or liability for websites of other organizations.

## CHILDREN

Our platforms are not directed towards children. If you are providing personal information for an individual less than 13 years of age, you are providing us your affirmative parental consent as the legal parent or guardian to collect, use and process the information of the individual less than 13 years of age, consistent with this Privacy Policy.

## DISPUTE RESOLUTION

These terms and conditions are governed by the applicable laws of Oman. You have a right to file a claim or complaint against our use of the information you provided to us in case you have sufficient reasons to believe that we used your personal information outside of the above policy, as per the following dispute resolution procedure:

1. write to us at [info@omanavenuesmall.com](mailto:info@omanavenuesmall.com) with all the relevant information and evidences, with “Dispute Resolution” in the subject header;
2. On our perusal of the provided evidence, etc., we will provide you with our responses to those, within forty five (45) days of our acknowledgement of your email;
3. If you are not satisfied with our responses, you can, within seven (7) days of our email, write to us for a meeting to discuss the matter further.
4. We will accordingly invite you for a meeting with the senior representatives of Oman Avenues Mall (or any of our parent or associated companies, advisors, etc.) within fifteen (15) days of receiving your email, subject to the availability of the relevant senior representatives.

5. In case either you or us are not satisfied with the final outcome of the meeting, the matter could be referred to arbitration by a sole arbitrator to be appointed by the relevant courts of Muscat, arbitrating under the Oman Arbitration Law, seated at Muscat and arbitrating in the English language.
6. The arbitrator's decision is final and binding on all parties.