



Privacy Policy

Revised by 15/10/2024

FYSM Market FZC LLC registered in accordance with the laws of the United Arab Emirates, registration number 4414135, license number 4414135.01, date of formation 30/07/2024, registered to the address Business Centre, Sharjah Publishing City Free Zone, Sharjah, United Arab Emirates (hereinafter referred to as the "Company"), is the copyright holder of <https://shop.fysm.co> (hereinafter referred to as "the Site" or "the Website").

With the respect to the UAE Federal Law 45 of 2021 regarding the Protection of Personal Data, Executive Regulations, Federal Decree 44 of 2021, applied within the scope of international data protection policies proliferation, all terms and concepts used herein shall have the following meanings:

Site means an internet website at the address: <https://shop.fysm.co> providing the User with an information platform for performing actions deemed by the features of a Site, the documentation placed on the Site.

Data processing or Processing means any operation or set of operations performed on personal data through electronic means, including other processing methods. This process includes collecting, storing, recording, organizing, adapting, modifying, circulating, transferring, retrieving, exchanging, sharing, using, describing, and disclosing personal data by broadcasting, transfer, distributing, making available, coordinating, merging, restricting, obfuscating, deleting, destroying, or modeling the data.

The Office means is the Emirates Data Office established within the framework of Federal Decree No. 44 of 2021. The Office is the main regulator for the UAE Data Protection Law.

Data Subject means the natural person who is the subject of the Personal Data. Any individual to which personal data belongs.

Data Controller means a state agency, municipal authority, legal entity or individual who independently or, in cooperation with other entities, organizes, and/or processes personal data, as well as determines the purpose and scope of data processing, and the actions (operations) related to personal data.

Data Processor is a party that process personal data under Data Controller's instruction. Such parties may perform data processing, subject to data subject's consent, on the basis of the corresponding agreement (including state contract) or by operation of the special state or municipal act.

Personal data is defined as information that relates to an identifiable person, either directly or indirectly. Sensitive personal data is a subset of personal data and is defined as any data that directly or indirectly reveals a natural person's family, ethnicity, political or philosophical views, religious beliefs, criminal record, Biometric Data, or any data related to that person's physical, psychological, mental, genetic or sexual health. This includes information related to healthcare service provisioning that can reveal the person's health status.

GDPR means General Regulation on the Protection of Personal Data (GDPR).

User data means personal data provided by the User to the Company by himself when filling out the form on the Site and during the verification, registration, as well as during the use of the Site as well as automatically transmitted data during the use of the Site, including but without limitation to IP address, information about the device from which access is made, etc.

Consent

An expression of full unconditional consent to the terms hereof is the installation at the registration stage of a checkbox / tick graphical user interface element that allows the User to control a state parameter:

<input type="checkbox"/>	I have read the Privacy Policy and give my full consent to the processing of my personal data.
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The Company ensures the security of personal information received from Site users. The Present Privacy Policy is designed to indicate the list of data that can be requested from Site users, as well as means of data processing employed by the Company and other associated persons.

The Present Privacy Policy also specifies the following:

- Details about what personal data is being collected or processed
- The purpose of processing and legal reason for collecting it
- The method of collecting the personal data
- The means of storing the personal data
- How long the data will be processed and when it will be destroyed
- The rights of the Data Subjects and how those rights can be exercised
- The contact details of and Data Protection Officer (email)
- Recipients of personal data and details of cross-border transfers



Collecting data

The Company collects personal information about Users that is necessary to render the services.

When using the services of the Company through the Site the following information about the user can be requested and received:

- Full name;
- Locality;
- Country, Region, city/town;
- Email address;
- Social media;
- Mobile phone number;
- Date of birth;
- Registration date;

We can also request additional information if necessary.

Storing data

Although the UAE Data Protection Law does not explicitly list the principles within the law, the principles are embedded in the requirements, there are seven key data privacy principles that form the fundamental conditions that Company follows when processing personal data.

- 1) Lawfulness, fairness and transparency. Company always processes personal data in a fair, lawful and transparent manner.
- 2) Purpose limitation. Company processes personal data only for a specified and lawful purpose.
- 3) Data minimization. Company processes only essential personal data which is necessary.
- 4) Accuracy. All personal data is kept by the Company up to date, and necessary measures are in place for correcting and updating inaccurate data.
- 5) Storage limitation. Company keeps personal data only for certain amount of time set by the laws and regulations.
- 6) Integrity and confidentiality. Company implements adequate security controls to ensure that personal data is protected against loss, destruction or damage.



7) Accountability. Company adopts appropriate measures and keeps records in place to be able to demonstrate compliance.

User's personal information is stored in accordance with regulatory requirements and the General Regulation for the Protection of Personal Data (GDPR) if applicable or Federal Law No 45 for a period not exceeding that necessary for the processing and provision of services. Such information may be stored until requested to be deleted.

In case of withdrawal of consent hereto, the processing of user's personal data will be terminated by Company and / or third parties, and the data will be destroyed.

Usage of data

The information provided by Users to the Company is used for identification and rendering of services. The information Company receive when User uses the Site is stored by the Company, and it acts as its controller. The information may then be used to make contracts and filling documents. The information may also be used to support and improve services, develop new services, personalize services, particularly, content and announcements, track performance, communicate with users, etc.

Methods of collecting, storing and processing

The Company may use the following methods of collecting personal data:

- Surveys
- Observations
- Questionnaires
- Interviews
- Focus groups
- Online Tracking
- Transactional data tracking
- Online marketing analytics
- Social media monitoring
- Form fills and registration data

The Company uses commonly applicable means of storing personal data, being personal data collector shares responsibility with the responsible entity



within the scope of applicable law of that state in which Company decides to store and process such data.

Cross-border data transfer policy and disclosure of personal information conditions

The Company may share Users' information with its employees, agents, contractors, partners and other companies associated with the Company for the purpose of rendering services. In doing so, the persons to whom the information has been transferred are required to adhere hereto.

The persons and entities above may use the information about users only for the purpose of rendering the services, they are not allowed to disclose and use the information for other purposes.

Unless expressed otherwise herein, this Policy only addresses the use and disclosure of client information provided to and collected by the Company. If the client discloses information to other parties, be it partners of the Company or other third-parties, different privacy rules pertaining to the use and disclosure of information may apply. The Company does not control the privacy policies of third parties and clients will be subjected to such privacy policies where applicable. The Company encourages its clients to review and familiarize themselves with the privacy policies of third parties.

- **DIRECT MARKETING**

Subject to applicable laws and regulations, the Company may from time to time send its clients direct marketing materials promoting its products, services or activities using information collected from clients. The Company will provide clients with the opportunity to opt-out of such direct marketing. The Company may from time-to-time request permission from clients to share their personal information with third-parties. Clients may opt-out of having their personal information shared with third parties and used for any purpose other than the purpose from which the information was originally collected and obtained with client authorization. If a client chooses to limit the use of their personal information, certain features or services provided by the Company might not be available to the client.

- **SECURITY**

The Company follows accepted physical and electronic procedures to safeguard and secure clients' personal and non-personal information. The Company uses various security measures such as encryption, firewalls, penetration testing, and access controls to protect clients' information. Company's Servers reside in maximum security vaults under 24/7 surveillance.



Additionally, access to information is restricted to authorized employees and third parties that need to know the information in order to operate, develop, and improve Company's Services. No method of transmission over the internet or method of electronic storage is 100% safe and consequently, hence the Company cannot guarantee its absolute security.

- **PRIVACY OF MINORS**

The Company does not allow persons under 18 to register for any service, and we do not knowingly collect personal information from any person under the age of 18. If a user is submitting personal information that is suspected of being younger than 18 years of age, the Company will require the user to close his/her account and will not allow the user to continue using its account. We will also take action to delete the account/information as soon as possible. You can get in touch with our support team if you know of any individuals under the age of 18 using our services so we can take action to prevent access to our services.

Third parties' disclosure exceptions

The Company do not disclose/transfer User's personal information to companies, organizations and/or any third party not affiliated with Company for the purpose of rendering services. The following constitute an exception:

- (1) The User herewith agreed to provide companies, private persons or other users that are not affiliated with Company an additional user consent shall be requested. The User may revoke this consent at any time.
- (2) Transfer of personal information in cases prescribed by the applicable Law. User's personal information may be disclosed if required to do so by the competent authorities, in the manner prescribed by applicable law, including but not limited to, if required by law, in connection with any legal proceedings or to protect legal rights.
- (3) Transfer of personal information in the event of sale or other assignment of corporate rights. In case of sale of the Company or any similar assignment of corporate rights, User's personal information will be transferred to the new owners of the corporate rights.
- (4) Fraud detection and prevention. User's personal information may be shared with law enforcement agencies for fraud prevention and suppression purposes.
- (5) Maintenance of technical or security problems.



Cookie Files

Cookies are small amounts of data that are sent to your browser and stored on your computer's hard drive to collect standard internet log information and visitor behavior information. When you visit Site, we can automatically collect information from you through cookies or similar technologies.

Company uses cookies to improve the functionality of the site, to allow users to navigate between pages, to remember the choices of users regarding the settings of the site.

Company also uses cookies to analyze how Users use service and interact with the website. Users can read more about cookies in our Cookie Policy.

Rights and Obligations

Under the provisions of the law, Users are provided with the following rights in relation to the processing of your personal data. To exercise your rights under the law, you may be required to authenticate yourself with adequate proof of identity.

- Right to Correct

Individuals can have their personal data rectified if inaccurate or completed if it is incomplete.

- Right to Enquire

You have the right to request and obtain information on your personal data that we hold and the purpose for which it is maintained by the Company.

- Right to Object

You have the right to object to being contacted by us for direct marketing purposes. On receipt of such objection, we will ensure that you are removed from the relevant marketing databases, as applicable. To opt-out from receiving direct marketing communications, please contact us at any time through the following channels:

Contact our Support Team via fysmmarket@gmail.com.

- Right to Demand Rectification, Blocking, or Erasure

You may apply to request to rectify, block or erase your personal data if the processing thereof is done in contravention of the provisions of the law, and if the data is incorrect, incomplete, or not updated, or if the processing thereof is illegal.

- Right to Withdraw Consent

At any time, after providing consent, you have the right to withdraw the



consent provided. Withdrawal of consent will be applicable to future use of the personal data and will not in any way impact legitimate use of the personal information prior to the withdrawal of the consent. Withdrawal of consent to process certain mandatory personal data related to services provided by the Company may result in our inability to continue the provision of those services.

- Right to Complain

You may submit a complaint to the Authority if you have reason to believe that any violation of the provisions of this privacy law has occurred or that we are processing personal data in contravention of its provisions.

Protection of personal information

Company takes necessary and sufficient organizational and technical measures to protect your personal information from unauthorized or accidental access to prevent the destruction, alteration, blocking, copying, distribution, unauthorized access to your personal information and data obtained during the use of the website or services Company.

Company restricts access to your personal information to employees, agents and contractors through strict contractual obligations, in accordance with the General Regulations for the Protection of Personal Data.

Legal information

If any provision of this Policy or its application to any person or circumstance is held invalid or unenforceable, the remainder of the Policy or the application of this provision to other persons or circumstances shall not be affected and shall remain in full force and effect.

All disputes and disagreements that arise upon any matter between the User and Company and threaten their rights and interests in relation to the preparation or application of the Present Policy, or any costs, obligations under the Present Policy, or in relation to any action related to the Present Policy shall be settled by negotiation.

In doing so, the Parties have agreed on the following dispute resolution procedures:

either party may notify the other party in writing, including by email, of a claim that has arisen in relation to or is related to the terms hereof.

In case of receipt of notification of the claim, the Parties shall appoint a meeting within 10 (ten) working days (including a meeting by teleconference



or similar) to discuss the dispute and make efforts to resolve them or send a written reasoned response to the claim to the available electronic addresses of the Parties within the specified period.

If the dispute has not been resolved within ten (10) business days from the date of receipt of the notice, and the parties do not agree to hold the meeting and take further action to resolve the dispute within that time, the parties can make a written complaint by sending it to the electronic addresses available to the parties.

In case of failure to achieve results through negotiations within 1 (one) month from the date of receipt of the claim, the dispute shall be resolved in accordance with the laws of the United Arab Emirates.

Amendments

Please note that the Company reserves the right, at our discretion, to change, modify, add, or remove portions of these Privacy Policy. Changes will be effective when posted on the Site with no other notice provided. Please check the website regularly for updates. Your continued use of the Site following the posting of changes hereto constitutes your acceptance of those changes.

Company's Privacy Policy is reviewed regularly to ensure continuous compliance with regulations, changes to business operations and practices are taken into consideration, and changes to technologies. All client information held will be governed by Company's most recent Privacy Policy. By continuing to use our Site, you accept the latest changes.

Company recommends you checking the present Privacy Policy on a regular basis to review the most current version of the Policy.

Contact

If you would like to exercise any of your rights or if you have feedback, comments, or questions about data protection or this Privacy Policy please contact us by email at fysmmarket@gmail.com or by mail at alternatively provided postal address.

We have a designated Data Protection Officer (DPO) whom you may contact at <https://shop.fysm.co> for any questions or concerns related to the handling of your personal data or this privacy policy.