Privacy Policy

1. Introduction

1.1 Global Whales Group (hereinafter referred to as the "Company", "We", "Our" or "Us") is a company incorporated under the laws of the United Arab Emirates.

We recognize the importance of protecting your privacy and maintaining the confidentiality of your Personal Data.

This Privacy Policy (hereinafter the "Policy") outlines the purposes and methods by which we collect, use, store, and protect your Personal Data in accordance with Federal Law No. 45 of 2021 on the Protection of Personal Data (the "Law"), as well as any other applicable local legislation.

2. Scope of Application

- 2.1 This Policy applies to any natural person interacting with our platforms, online services, and mobile applications.
- 2.2 It governs how we process your Personal Data across the UAE or internationally, including data processed in regulated areas such as the DIFC or ADGM, provided that local data protection laws are also respected.

3. Personal Data We Collect

- 3.1 "Personal Data" means any information related to an identified or identifiable individual. This includes, but is not limited to:
 - Identity Data: full name, nationality, gender, date and place of birth, government-issued ID
 - Contact Data: email address, phone number, physical address
 - Financial Data: IBAN, payment card, e-wallet, country of tax residence
 - Technical Data: IP address, device type, browsing data
 - Profile Data: login credentials, preferences, purchase history, campaign participation

4. Purpose of Processing

We process your Personal Data for the following purposes:

- To create and manage your account
- To fulfill our contractual obligations
- To improve our services and user experience
- To respond to your inquiries or requests
- To comply with legal obligations
- To send you promotional communications (with your consent or based on legitimate interest)

5. Legal Bases for Processing

In accordance with UAE Federal Law No. 45/2021, processing is based on:

- Your clear and explicit consent
- The performance of a contract
- Legal obligations
- Legitimate interest (e.g., platform security, internal marketing, fraud prevention)

6. Data Storage and International Transfers

- 6.1 Your Personal Data may be stored on secure servers either locally or abroad, subject to appropriate safeguards in accordance with the Law.
- 6.2 In the case of international transfers, we ensure that recognized standards (e.g., standard contractual clauses, certifications) are met.
- 6.3 Data may be shared with:

- Technical and hosting providers
- Payment services
- UAE government authorities
- Contractually bound business partners

7. Your Rights (under Law No. 45/2021)

You have the following rights:

- Access to your data
- Correction of inaccurate data
- Erasure of your data (under certain conditions)
- Objection to certain processing activities
- Data portability to another provider
- Withdrawal of consent
- Filing a complaint with the UAE Data Office

8. Data Retention

We retain your data only as long as necessary for the stated purposes or as required by legal and regulatory obligations (e.g., tax, commercial laws).

Once the retention period expires, the data is deleted or anonymized.

9. Cookies and Similar Technologies

We use cookies to:

Optimize website functionality

- Personalize your experience
- Track user interactions
- Analyze website performance

You may refuse or manage cookies via your browser settings.

10. Data Security

We implement technical and organizational measures to protect your data against unauthorized access, loss, alteration, or disclosure, including:

- Data encryption
- Access restriction based on role
- Access logs
- Continuous monitoring

11. Public Forums and Third Parties

Your use of public forums or groups (e.g., Telegram, Discord) is at your own risk.

Any information shared may be viewed or used by others.

We are not responsible for how third parties may use this information.

12. Third-Party Websites

Our site may contain links to third-party websites.

We are not responsible for their privacy practices or their content.

13. Communication Recording

We may record or monitor phone calls, messages, or electronic exchanges in order to:

- Execute or confirm a transaction
- Process complaints
- Improve service quality

14. Changes to This Policy

We may update this Policy from time to time.

In the event of a material change, we will notify you via our website or email.

The most current version will always be available on our website.

15. Contact

For any questions regarding your Personal Data, or to exercise your rights, please contact:

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- SRTIP, University City Sharjah
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