

# Privacy Policy

This Privacy Policy ("Policy") dated 1st July 2021 replaces our previous policies. Please take the time to review before you continue to use any of our products and services. We are committed to protecting and respecting your privacy. This privacy policy explains the types of personal information we collect, how we use that information, who we share it with, how we protect that information, and your legal rights in relation to your information.

For the purpose of applicable data protection laws, the Data Controller is jointly and severally **Al Hilal Publishing & Marketing Group WLL** and **North Star Technology WLL** ( hereinafter referred to as **The Data Controller**) based at PO Box 1100 Manama, Kingdom of Bahrain.

This privacy policy governs the collection and use of personal information by **DATA CONTROLLER**.

This is the main privacy policy for **DATA CONTROLLER** and is applicable to our services provided through this website ("our site").

**DATA CONTROLLER** with the permission of its Chanel Partners may use and share amongst themselves the information you provide and other information held about you for the purposes set out below.

**Please read this policy carefully as it explains our views and practices regarding your personal information and how it is handled. By accessing or browsing our website, you confirm that you have read, understood and agree to this privacy policy in its entirety. If you do not agree with the practices described in this policy, you should not use this website.**

The **DATA CONTROLLER** will collect different types of information about our users and enquirers for three main reasons:

1. To provide personalised services unique to individual users.
2. To help us to monitor and improve the services we offer
3. If we have permission from the user, to market services to them.

## Our principles

1. We do our very best to protect your privacy by using security technology appropriately. This means:
  - we make sure that we have appropriate security measures to protect your information; and
  - we make sure that when we ask another organisation to provide a service for us, they have appropriate security measures.
2. We will respect your privacy. You should receive marketing emails only from us and, if you agree and from other organisations we have carefully chosen. We will make sure it is clear when you can make these choices, for example, we have boxes you need to tick if you want to receive marketing.
3. We will collect and use individual user details only if we have your permission or we have sensible business reasons for doing so, such as collecting enough information to manage our communications with you.
4. We will be clear in our dealings with you as to what information about you we will collect and how we will use it.
5. We will use personal information only for the purposes for which it was originally collected and we will make sure we delete it securely.
6. Our site is accessible via the internet.

## How we use your information

### What information do we collect?

We collect information on you:

- when you enquire for further information or for our services
- when you use the website

Certain services that we provide may involve us collecting extra information such as where you are, so the service can be provided as designed.

## Contact Us

The minimum information we need is your name, email address and a telephone numbers. We will ask you more questions for different services. Unless we say otherwise, you have to answer all your contact information.

We may also ask some other, voluntary questions during your contact of us for certain services (for example, professional networks) so we can gain a clearer understanding of who you are. This also allows us to personalize services for you.

After you have contacted us, we may send you emails we think may interest you. At any time you can decide not to receive these emails and will be able to 'unsubscribe'

## Use of children's data

We do not knowingly collect or store any personal information about children under the age of 16.

## Our use of your personal information

We may use your personal information to:	How do we use personal information for this purpose?
Provide you with services	We will need to use your personal information where this is necessary for us to perform our obligations with you, for example where you have require products and services from us, or our channel partners and to ensure your requirements are met at all times.
Ensure that your requirements are met when you use our services	We may use your personal information to better understand your requirements and preferences, so that we can provide you with a tailored experience.
Contact you for research purposes or to tell you about our services	We will need to use your personal information (such as your email address and/or telephone number) to send you information about services that you may be interested in. Please note that we may also share your personal information with other entities in the for this purpose.
Diagnose problems with our server or administer our websites	We may need to use personal information, such as your IP address, to diagnose server problems or administer our websites.
Analyse user traffic to measure use of our websites and to improve the content of our websites and our services	We may sometimes use your personal information (e.g. your IP address) to measure use of our websites and assess the effectiveness of our site pages, including advertising on our sites. We may also use this personal information to improve the content of our websites and services.
Comply with legal requirements and exercise or defend legal claims	We may sometimes need to process personal information to comply with legal requirements to which we are subject (for example, in relation to confirm qualifications ).

## Transfers of personal information

We may share your personal information with any channel partner member of the **DATA CONTROLLER** or selected third parties for direct marketing purposes, in order to enable you to access the services, provide you with customer support and conduct the other activities described in this privacy policy. Such group companies may be located outside the European Economic Area ("EEA"), in which case the section "Where we store your data" below will apply.

We may use other companies, agents or contractors ("Service Providers") to perform services on our behalf or to assist us with the provision of services to you. For example, we may engage Service Providers to provide market research, meetings, training, IT, hosting and other infrastructure and data cleansing and processing services. In the course of providing such services, these Service Providers may have access to your personal information. These third parties are contractually bound only to use personal information to perform the services that we hire them to provide. We will always use our best efforts to ensure that all the Service Providers we work with will keep your personal data secure.

We may also disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if **DATA CONTROLLER's** assets are acquired by a third party, in which case personal data about its customers will be one of the transferred assets; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or in order to enforce our terms and conditions or other agreements, or to protect the rights, property or safety of the **DATA CONTROLLER** group.

## Where we store your data

The data that we collect from you may be transferred to, and stored at, a destination outside the EEA. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the provision of services to you or the processing of your payment details. We will take all steps that are mandatory or reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy and applicable data protection laws, including, where relevant, entering into EU standard contractual clauses (or equivalent measures) with the party outside the EEA receiving the data.

## Security of personal information

We use administrative, technical, and physical measures to safeguard personal information against loss, theft and unauthorized uses, access or modifications.

Certain areas of our websites may be password protected. Where we have given you (or where you have chosen) a password, you are responsible for keeping this password confidential. We ask you not to share your password(s) with anyone.

## Use of Cookies

We may use cookies for a number of reasons.

1 For statistical purposes to track how many users we have and how often they visit our websites. We collect information listing which of our pages are most frequently visited, and by which types of users and from which countries.

2 We use other organizations to collect anonymous user information, sometimes through cookies and web beacons,(information embedded in images which allow them to analyze how the website is being used and the number of visitors).

**By using the sites you are agreeing to the use of cookies as described.**

## **Your Rights**

You have the following rights with respect to the personal information that we hold about you:

### **Your right to access the information we hold about you**

You have the right to ask us whether we process your personal data and to request information on the purposes of data processing as well as confirmation on whether we use your personal information for these purposes only.

You can request access to the information we hold about you by contacting us using the contact details set out below. We will endeavor to make our file of your information available to you within 1 month, although occasionally we may not be able to give you access to the personal information we hold about you (for example, we may not be able to give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety).

You also have the right to be informed of the third parties to which we transfer your personal data within the scope of this privacy policy.

### **Your right to have your information corrected or deleted**

You have the right to have your information corrected or deleted. Please send your request to [consult@hilalcomputers.com](mailto:consult@hilalcomputers.com) and we will action it as soon as possible.

### **Your right to object to us processing your data**

You have the right to ask us to stop processing your data, even where that processing is necessary for our legitimate interests (for example, where the processing is necessary for the legitimate objectives we pursue in the course of our business), including the profiling we undertake to send you personalized offers, service recommendations and similar content. You also have the right to object to any results of a processing activity that prejudice your rights and that are conducted exclusively through automated systems.

You also have the right to ask us to stop processing your data for direct marketing purposes, including any profiling we undertake for the purposes of direct marketing. We will in any case only send you marketing communications if you have previously agreed to this, but if you change your mind you can easily unsubscribe from our marketing communications at any time by following the instructions included in these marketing communications.

Please note that, if you have consented to receive offers from our partners, our partners are responsible for taking account of your rights, including your right to opt-out of receiving offers from them.

### **Making a complaint**

You have the right to lodge a complaint with the data protection authorities if you believe that we have not complied with applicable data protection laws. You also have a right to claim damages if processing of your personal information violates applicable data protection law.

### **Changes to our privacy policy**

We reserve the right to amend this privacy policy at our sole discretion, without prior notice to you. We will notify you of any such changes (including when they will take effect). Your continued use of our services or our websites following the posting of changes to these terms means that you consent to those changes.

### **Contacting us**

If you have any questions about this privacy policy, you can email us at: [consult@hilalcomputers.com](mailto:consult@hilalcomputers.com)

If you would like access to or a copy of the personal information we hold about you, to request a correction, or have any questions about how we may use it or to make a complaint, please contact the Data Protection Manager at the address shown above. Or, email [consult@hilalcomputers.com](mailto:consult@hilalcomputers.com) or:

**The Data Protection Officer**, Data Controller, Al Hilal Publishing & Marketing Group WLL / Northstar Technology WLL, P.O. Box 1100, Manama, Kingdom of Bahrain