

ATCMarket Privacy Policy

We at ATCMarket (“**we**” , or “**us**”) recognize the importance of privacy and confidentiality of personal information.

ATCMarket (“**ATCMarket**” or, the “**Platform**”) is a business to consumer (or “**B2C**”) and a business to business (or “**B2B**”) platform which connects and facilitates sales and purchases between business sellers (or “**Sellers**”) and consumer buyers (or “**Buyers**”).

This Privacy Policy sets out the ways in which we collect, use and disclose information in connection with the operation of the Platform, including personal information about you, Platform users, visitors and representatives. This Privacy Policy also applies to the use of the Platform via your mobile device.

For users in all locations: If you are a registered member of the Platform, and you access and use the Platform from any of the Relevant Jurisdictions, you are contracting with ATCMarket Portal (incorporated in in the UAE under Reg. No. 1452849).

A. COLLECTION OF INFORMATION

The personal information that we collect from you, either directly or indirectly, will depend on how you interact with us and the Platform. Such personal information broadly falls into the following categories:

Information That You Provide To Us:

We collect personal information directly from you when you choose to provide us with this information through your use of the Platform and through your other interactions with us, such as where you issue a complaint. Certain parts of the Platform ask you to provide personal data in order to set up and use it to as a Buyer or Seller.

If you are a Buyer, we will ask you to provide the following personal information:

Data Category	Data description
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Account and profile information	Such as name; username; birthday; gender; address; phone number; email address, and profile image.
Payment Information	Such as credit card or similar payment account information that you intend to purchase with; billing and delivery address.
Purchase Information	Such as details of the goods purchased and how many; order ID; logistics information and some other information for delivery, returns, refund, sales tax determinations, and payment operations; We also collect information that is required for extended warranty purposes and your transaction and purchase history on or through the Platform.
Complaint Information	Such as information connected with the Platform or goods and/or services purchased via the Platform as such information relates to a complaint, for example, the photographs you upload for the products reviews or complaints.
Identity Information	Such as a form of ID like a passport or other identity verification for customs clearance purposes or after-sales services.
Correspondence Information	Such as your correspondence with us via various channels, such as email, phone, online chat service, social media, mail, instant chat and our customer service department.
General Personal Information	When you optionally provide such information, we may collect general personal data that cannot identify you, such as body shape, personal height, chest/waist/hip circumference, and weight. For example, this information may be used by us to recommend clothing sizes or styles, personalization, or to provide fit prediction services for you.

If you are a Seller (i.e. if you are an employee or representative of a Seller or a sole trader Seller (we' ll refer to you as a Seller)), we will ask you to provide:

Data Category	Data description
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Seller Business Information	Such as your corporate registration; business licenses, tax or other related information (where applicable).
Seller Payment Information	Such as your bank account details or other payment information the Seller uses to receive payment.
Product Information	Such as details of the goods and products the Seller intends to sell via the platform.
Seller Contact Information	Such as your name; address; phone number; fax and email address.
Social Media Information	Where you are a certified blogger or influencer for us, information such as your contact and social media account/blog information.
Questionnaire Information	Such as any response to questionnaires for market research/analytics which you choose to partake in which can include marital status, nationality, gender, date of birth, annual income and spending preferences. In some circumstances this could include or constitute information which is considered more sensitive. If you prefer not to provide such information, the use of our services and products will not be affected.
Correspondence Information	Such as your correspondence relating to a customer service department, chat service, telephone or email.

Information That We Collect Indirectly:

If you are a Buyer or Seller or prospective Buyer or Seller, we will collect personal information indirectly, including through automated means from your device when you use our Platform. Some of the information we collect indirectly is captured using cookies and other tracking technologies as explained further in section F "COOKIES" below. We collect the following personal information indirectly:

Data Category	Data description
Platform Activity Information	Such as details on the types and specifications of the goods sold and purchased, pricing and delivery information, any dispute records, communications between Buyers and Sellers and any information disclosed in any discussion forum.

Platform Usage Information	Such as information relating to how you use and engage with the Platform including IP addresses, date and time of access to the Platform, device type, unique device identification numbers, browser type, broad geographic location (e.g. country or city-level location), browsing patterns and details of how you have interacted with our Platform and the goods and services available on it. In addition, we gather information about the Platform and visitors to the Platform including browser software, operating system, software and hardware attributes, pages viewed, number of sessions and unique visitors.
Derived Information	Such as information we derive or infer about you based on your browsing and buying activity information and other information we have collected about you.
Social Media Content	Where you are a certified blogger or influencer for us, your social media account handles and posts/comments made in relation to the Platform.
Platform Contacts	Such as people or accounts with whom you share content or interact and contact information if you choose to upload or import it from a device (such as an address book).
Profile Information	Including your style preference, if you voluntarily choose to provide it for personalization purposes.

Information That We Receive From Third Parties:

If you are a Buyer or Seller we may receive personal information about you from third party sources, such as verification service providers and social media platforms where you choose to register for a Platform account via a social media account.

We will only collect personal information from third parties where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

We collect the following personal information from the following categories of third parties:

Data Category	Data description
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Social Media Profile Information	This may differ depending on which social media platform you are using and your privacy settings within the social media account but generally this will include basic public profile information such as your social media username, nickname or account name; your social media profile picture; country and company name (if applicable).
Compliance Information	Such as information required for the purpose of carrying out suitable money laundering, fraud and "know your customer" checks, including your name; email address; company details; and contact information.
Logistics Information	updated delivery and address information from our carriers or other third parties, which we use to correct our records and deliver your next purchase or communication more easily.

B. USE OF PERSONAL DATA

We collect and use your personal information for the following purposes:

- **Verifying Platform account registrations**, including conducting fraud, security, "Know Your Customer" and anti-money laundering checks in order to approve your Seller account;
- **Verifying your eligibility** as a Platform blogger or influencer;
- **Setting up / administering Buyer and Seller accounts**, including providing log-in IDs and setting up payment / transaction accounts;
- **Providing customer service support**, such as responding to your queries, feedback and managing claims and/or disputes;
- **Providing/supporting general Platform services**, facilitating communication between Buyers and Sellers, processing transactions and payments, assessing advance withdrawal requests from Sellers and providing logistics and delivery services, supporting Sellers with logistics and delivery;
- **Supporting Buyer and/or Seller clearance declarations / applications** where made via the Platform;
- **Providing relevant membership benefits**, including birthday rewards, membership offers and coupons, anniversary awards, exclusive member prices;
- **Verifying your identity and purchases in connection with product warranty or other after-sales claims**;

- **Assessing and monitoring account security and transaction risks** of Buyers and Sellers, such as detecting and preventing fraud, money laundering and other security incidents;
- **Recommendations and personalization**, such as using your personal information to recommend features, products, and services that might be of interest to you, identify your preferences, and personalize your experience with our services.
- **Conducting research and analytics to ensure the security of our Platform**, to improve the content and layout of the Platform, and to improve our Platform, product offerings and services;
- **Help you find people you may know who are also using ATCMarket;**

We may also use your personal information for other purposes that are compatible with the purposes we have disclosed to you if and where this is permitted by applicable data protection laws. You can request further information about the compatibility of other purposes upon request.

C. DISCLOSURE OR SHARING OF PERSONAL INFORMATION

We disclose/share personal information with the following categories of recipients:

- **Other Platform Buyers and/or Sellers** where necessary to support purchases and communications made between you. If you are a Buyer, Sellers that you purchase from will also control personal information about you relevant to or connected with your Platform purchases and communications with them. Please refer to the respective Seller Privacy Policies for information about how they will process your information.
 - Please note that, in using our services, you may share personal information to others; for example, when other users view items on our platform, they may see item reviews you left as well as your profile image and nickname.
- **Third party partners and service providers and/or affiliates** engaged by or working with us to assist us in providing services to you or who otherwise process personal information for purposes described in this Privacy Policy or notified to you when we collect your personal information. Categories of these partners and service providers include:
 - **ATC Gulf group entities and affiliated companies** and/or their designated service providers that work with us to provide processing services such as

software, tools, systems and messaging services for purposes described in this Privacy Policy. Please refer to Alibaba annual financial report for the group entities.

- **Our business partners** (for example, in order for them to provide you with discounts or offers that may interest Buyers or prospective Buyers) where you have consented to receiving such information from them if required by applicable data protection laws;

- **Marketing and advertising partners**, such as Google, X, Facebook, and Instagram, and providers of analytics services, so that they may tailor the content you see when visiting our Platform for analytics and/or advertising purposes. These partners may combine information they collect on our Platform with data on their platforms and data they collect from other websites or through other sources in order to conduct targeted advertising. The processing activities of these third parties marketing platforms are governed by their own privacy policies, not this Privacy Policy (please refer to section F “COOKIES” below);

- **Payment service providers** that provide payment processing services, such as Stripe and Telr. Please note some activities of payment service providers may be governed by their own privacy policies, not this Privacy Policy;

- **Logistics partners**, such as ARAMEX, DHL, FedEx, and iCARRY Logistics providing delivery services for Buyers and Sellers, including return and exchange of products, and warehousing services for Sellers;

- **Customs agents for customs clearances purposes**, where applicable to support Buyers and Sellers with international sales/purchases;

- **Third party rating / reviewing service providers** to carry out reviews or surveys of our services with customers if you choose to participate in reviewing or rating Platform products and/or services;

- **To our professional advisers, law enforcement agencies, insurers, government and regulatory and other organizations** where we believe it is necessary to comply with applicable laws or to exercise, establish or defend our legal rights or protect your vital interests or those of any other person; or as otherwise required or permitted by applicable laws.
- **To an actual or potential buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy.
- **To any other person with your consent to the disclosure.**

D. RETENTION

We will retain your personal information for as long as we have an ongoing legitimate business need to do so, to provide services or products to you, or as required or permitted by applicable laws. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. How long your data is kept for will also depend on how you use our website (for example if you are logged in as a member or you are visiting our website as a guest) and what the information you provide to us is used for. For example, if you are a registered member, certain data will be retained for a length of time following termination or deletion of your account, in order to comply with applicable laws [(for example, if a court order is received about your account, we would retain your account data for longer than the usual retention period when an account is deleted)] or in case of disputes. In other instances, the period of retention may be determined according to your activity on the Platform or to comply with a specific arbitration period/resolve a dispute.

E. RIGHTS REGARDING PERSONAL DATA

Under applicable laws, you may have rights of access to personal information held by us and other rights.

F. COOKIES

This section explains how we use cookies and similar technologies (we refer to them collectively as “**cookies**”) to recognize you when you visit our Platform. It explains what these technologies are and why we use them, as well as your rights to control them.

What are cookies?

A cookie is a string of information that is sent to your browser and stored on your computer ' s or mobile device' s hard drive. If you do not de-activate or erase the cookie, each time you use the same browser or device to access the Platform, our web servers will be notified of your visit to the Platform and, in turn, we may have knowledge of your visit and the pattern of your usage.

Cookies set by the site or app owner (in this case, ATCMarket) are called “**first party Cookies**” . Cookies set by third parties other than the site or app owner are called “**third party Cookies**” . Third party Cookies enable third party features or functionality to be provided on or through the website (e.g. like advertising, interactive content and analytics).

The parties that set these third-party cookies can recognize your device both when it visits the website in question and also when it visits certain other websites.

Cookies are also categorized as “**session Cookies**” (which are erased once you close the browser or shut down the device) and “**persistent Cookies**” (which remain even after closing the browser or shutting down the device/application and which are activated each time you visit the Platform). Session cookies use encrypted data to authenticate you. Persistent Cookies do not store account numbers or passwords. We use both session cookies and persistent cookies.

Why do we use Cookies?

We use first- and third-party Cookies for several reasons.

Some Cookies are required for technical and/or security reasons in order for our Platform to operate, and we refer to these as “essential” or “strictly necessary” Cookies. First party Cookies are mainly served to enable basic functionality on our Platform; including web analytics Cookies that help us understand how users use our web pages and how we can improve their use. For example, we use essential or strictly necessary Cookies to enable us to remember goods added to your shopping basket and to recognize you when you sign into your account.

We also use social media Cookies. You may register for Platform membership and “share” Platform content through social media such as Facebook and Twitter. Sometimes we embed videos from websites like YouTube. These websites have their own privacy policies which govern their use of information, which you can find on the respective websites.

We also use Cookies to enable us to track and target the interests of Platform visitors to enhance the experience on our Platform by researching visiting patterns and conducting interest-based advertising; assisting our partners in tracking user visits to the Platforms; and to track progress and participation in promotions and the success of our email marketing campaigns. We use first- and third-party Cookies for these purposes.

For more information about the Cookies we use, please see our [Cookie Notice](#).

G. MINORS

The Platform is intended for adults and users must be over 18 to use our Platform. We do not intend to sell any of our products or services to minors, as defined by applicable law. If a minor has provided us with personal information without parental or guardian consent, the parent or guardian should contact data-protection@atc-gulf.com to remove the information.

H. SECURITY MEASURES

We implement appropriate technical and organisational measures to prevent unauthorized access to the Site, to maintain data accuracy and to ensure the correct use of the information we hold. Upon becoming aware of a data breach, we will notify you and the regulatory authorities in accordance with the timescales and scope required by applicable data protection law.

For registered users of the Platform, some of your information can be viewed and edited through your account, which is protected by a password. It is your responsibility to keep your password secure and confidential. We recommend that you do not divulge your password to anyone. We have instructed our personnel to never ask you for your password. If you share a computer with others, you should not save your log-in information (e.g., user ID and password) on that shared computer. Remember to sign out of your account and close your browser window when you have finished your session

No data transmission over the internet or any wireless network can be guaranteed to be perfectly secure. As a result, while we use appropriate technical and organizational measures to protect the information we hold for you, we cannot guarantee the security of any information you transmit over the internet.

I. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments.

When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make and as required by applicable law, such as by posting an amended Privacy Policy on the Platform.

Legal Basis for Data Processing

We process personal information for the purposes set out in this Privacy Policy. Our legal basis to process for processing your personal information will depend on the personal information concerned and the specific context in which we collect it, but will rely on one of the following legal bases:

- **Contract** – we require certain personal data in order to provide the Platform to you under the contract between you and ATCMarket (for example, to provide you with the services you request and to identify and authenticate you so you may use the Platform);
- **Legal obligation** – there are instances where we must process and retain your personal data as necessary to comply with legal requirements (for example, to comply

with applicable accounting rules and to make mandatory disclosures to law enforcement);

- **Legitimate interests** – we will use or disclose your personal data for the legitimate interests of either ATCMarket or a third party, but only where we are confident that your privacy rights will remain appropriately protected. If we rely on our (or a third party's) legitimate interests, these interests will normally be to operate our Platform and services, manage our relationship with you and communicate with you as necessary to provide our services to you and for our legitimate commercial interest, for instance, when responding to your queries, improving our Platform and our services, undertaking marketing, or for the purposes of ensuring the security of our Platform and services and detecting or preventing illegal activities such as fraud. We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are.
- **Consent** – in certain circumstances, we may ask for your consent (separately from any contract between us) before we collect, use or disclose your personal information, in which case you can voluntarily choose to give or deny your consent without any negative consequences to you.

If we ask you to provide personal information to comply with a legal requirement or to enter into a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). In some instances, you may be required to provide us with personal information for processing as described above, in order for us to be able to provide you all of our services, and for you to use all the features of our Platform.

The following table provides more details on our purposes for processing your personal information and the related legal bases. The legal bases under which your data is processed will depend on the data concerns and the specific context in which we use it.

Purpose	Type of personal information	Lawful basis for processing including basis of legitimate interests
Verifying Platform account registrations, including conducting fraud, security, "Know Your	Compliance Information	<ul style="list-style-type: none">· Legal obligation.· Performance of a contract with you.

Customer” and anti-money laundering checks in order to approve your Seller account.	Seller Business Information Seller Contact Information	
Verifying your eligibility as a Platform blogger or influencer.	Social Media Information Social Media Content Social Media Profile Information	<ul style="list-style-type: none"> · Performance of a contract with you.
Setting up / administering Buyer and Seller accounts , including providing log-in IDs and setting up payment / transaction accounts.	Buyer Contact Information Buyer Payment Information Purchase Information Seller Business Information Seller Payment Information Product Information Seller Contact Information Social Media Profile Information	<ul style="list-style-type: none"> · Performance of a contract with you.
Providing customer service support , such as responding to your queries, feedback and managing claims and/or disputes.	Complaint Information Correspondence Information	<ul style="list-style-type: none"> · Performance of a contract with you. · Otherwise, as necessary for our legitimate interests to protect our business interests when conducting or defending a claim or to communicate with you where our communications are not necessary to perform or

		enter into a contract with you.
Providing/supporting general Platform services , facilitating communication between Buyers and Sellers, processing transactions and payments, assessing advance withdrawal requests from Sellers and providing logistics and delivery services, supporting Sellers with logistics and delivery.	Buyer Contact Information Buyer Payment Information Purchase Information Seller Business Information Seller Payment Information Product Information Seller Contact Information Correspondence Information Platform Activity Information	<ul style="list-style-type: none"> · Performance of a contract with you. · Otherwise, as necessary for our legitimate interests to operate our Platform and to communicate with you where our communications are not necessary to perform or enter into a contract with you.
Supporting Buyer and/or Seller clearance declarations / applications where made via the Platform.	Buyer Contact Information Buyer Payment Information Purchase Information Seller Business Information Seller Payment Information Product Information Seller Contact Information	<ul style="list-style-type: none"> · Performance of a contract with you. · Legal obligation. · Otherwise, as necessary for our legitimate interests to operate our Platform and communicate with you where our communications are not necessary to perform or enter into a contract with you.
Providing relevant membership benefits , including birthday rewards, membership offers and coupons, anniversary	Buyer Contact Information Buyer Payment Information	<ul style="list-style-type: none"> · Consent (where required under applicable law)

awards, exclusive member prices.	Purchase Information	<ul style="list-style-type: none"> · Otherwise, as necessary for our legitimate interests to operate our Platform and communicate with you. · To the extent it relates to our contractual agreement with you, for the performance of a contract with you.
Verifying your identity and purchases in connection with product warranty or other after-sales claims.	Buyer Contact Information Buyer Payment Information Purchase Information Identity Information	<ul style="list-style-type: none"> · Performance of a contract with you. · To the extent identity verification is required by law, in compliance with a legal obligation.
Assessing and monitoring account security and transaction risks of Buyers and Sellers, such as detecting and preventing fraud, money laundering and other security incidents.	Buyer Payment Information Purchase Information Seller Payment Information Product Information Platform Activity Information Compliance Information	<ul style="list-style-type: none"> · As necessary for our legitimate interests to protect and operate our Platform, including to detect or prevent illegal activities and/or to manage the security of our IT infrastructure, and the safety of all users of the Platform. · Legal obligation.
Sending and serving tailored marketing and advertising that we believe will be of interest to you based on the ways in which you use the Platform, your browsing records, and order history.	Buyer Contact Information Purchase Information Platform Activity Information Platform Usage Information	<ul style="list-style-type: none"> · Consent (where required under applicable law). · Otherwise, our legitimate interests to develop marketing activities and to promote our

	Derived Information	products and services to you.
Conducting research and analytics to ensure the security of our Platform , to improve the content and layout of the Platform, and to improve our Platform, product offerings and services.	Questionnaire Information Platform Activity Information Platform Usage Information Product Information Purchase Information	<ul style="list-style-type: none"> · Consent (where required under applicable law). · Otherwise our legitimate interests to operate and provide our Platform and improve our Platform.
Help you find people you may know who are also using ATCMarket	Platform Contacts	<ul style="list-style-type: none"> · Our legitimate interests to operate our Platform, or with your consent

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information,.

Your Rights

- The right to **access your personal information and confirm the existence of processing**.
- **The right to correct, update or request anonymization, blocking or deletion** of your personal information.
- The right to **object to processing** of your personal information when it is based on our legitimate interests.
- The right to ask us, in some situations, to **restrict processing** of your personal information or request portability of your personal information.
- The right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you to opt-out of other forms of marketing (such as postal marketing or telemarketing)
- If we have collected and process your personal information with your consent, then you have the right to **withdraw your consent at any time**. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

- The right to **request the review of decisions exclusively based in automated processing**, which might affect your interests.
- The right to **complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority. Certain supervisory authorities will require that you exhaust our own internal complaints process before looking into your complaint.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

If you are aware of changes or inaccuracies in your information, you should inform us of such changes so that our records may be updated or corrected.

Information Pertaining to Children

Our Platform is not directed to and we do not intend to, or knowingly, collect, or solicit personal information online from users under the age of 18, nor children under the age of 13. We do not knowingly collect personal information from children under the age of 13 or have any reasonable grounds to believe that children under the age of 13 are accessing or using our Platform. If you believe that a child under 13 may have provided us personal information.

Use of Personal Information. The business purposes for which we collect and handle personal information is described above in section B. USE OF PERSONAL DATA above.

Disclosure of Personal Information. We disclose or share personal information in the ways described above in section C. DISCLOSURE OF PERSONAL DATA, including by allowing third parties that provide us analytics and advertising services to collect information through cookies and other similar technologies.

The types of personal information that we may share include unique identifiers (e.g., cookies and similar technologies), device information, geolocation data, commercial data, behavioural data, and inferences.

To the extent that the use of cookies and other tracking technologies to disclose certain personal information to third parties to display targeted or personalized advertisements to you constitutes a "sale" or "sharing" of personal information under the CCPA, you may opt out of such cookies at any time by adjusting your cookie choices in our [Cookie Preferences](#) on our Platform to adjust your cookie choices.

We do not "sell" or "share" sensitive personal information, nor do we "sell" or "share" any personal information about individuals who we know are under sixteen (16) years old.

Legal Basis for Data Processing

Your Rights

You have the following data protection rights, which you can exercise at any time

- The right to access your personal data and confirm the existence of processing.
- The right to correct, update or request anonymization, blocking or deletion of your personal information.
- The right to object to the processing of your personal information where it is based on our legitimate interests or in case of non-compliance with LGPD or applicable law.
- The right to ask us, in some situations, to restrict the processing of your personal information or to request portability of your personal information.
- The right to cancel marketing communications we send you at any time. You may exercise this right by clicking on the "unsubscribe" or "unsubscribe" link in marketing e-mails that we have sent to you. To unsubscribe from receiving other forms of marketing (such as postal marketing or telemarketing
- If we collect and process your personal information with your consent, you have the right to withdraw your consent at any time and request deletion of your personal data. Withdrawing your consent will not affect the lawfulness of any processing carried out prior to your withdrawal, nor will it affect processing of your personal information carried out on a legal basis other than consent.
- The right to request a review of decisions based solely on automated processing, which may affect your interests.
- The right to petition the National Data Protection Authority - ANPD about our collection and use of your personal information.
- The right to request portability of your personal data to another service provider;
- The right to request information about with whom your personal data has been shared.

We respond to all requests we receive from individuals who wish to exercise their data protection rights in accordance with applicable data protection laws. If you are aware of changes or inaccuracies in your information, you must inform us of such changes so that our records can be updated or corrected.

Your Rights

You have the following rights regarding your personal information: i) access; ii) rectification; iii) cancellation; iv) objection; v) revoking your consent; vi) limit the use or disclosure of your personal information.

LANGUAGE

If there is any conflict between the English version and another language version of this Privacy Policy, the English version shall prevail.