

Effective date: **July 01, 2024**

“WHAT DOES THIS PRIVACY POLICY COVER?”

Your privacy is very important to Enterprise Solutions Worldwide FZ-LLC (also known and providing services as [Distress Sales](#)) . We are committed to protecting your personal data (as described in more detail below). We want to be transparent with you about how we collect and use your personal data in providing you with our website and mobile application services (the “ **Platform** ”) and to inform you of your privacy rights and how the law protects you.

This Privacy Policy aims to provide you with information about how Distress Sales collects and processes your personal data through your use of this Platform.

By using the Platform, you consent to the collection, use and transfer of your personal data as described in the Privacy Policy.

With this in mind, this Privacy Policy covers:

- WHO WE ARE AND HOW TO CONTACT US
- PERSONAL DATA WE COLLECT FROM YOU
- PERSONAL DATA WE COLLECT FROM OTHER SOURCES
- HOW AND WHY WE USE YOUR PERSONAL DATA
- WHO WE SHARE YOUR PERSONAL DATA WITH
- HOW WE KEEP YOUR PERSONAL DATA SECURE
- HOW LONG DO WE STORE YOUR PERSONAL DATA?
- YOUR RIGHTS REGARDING YOUR PERSONAL DATA
- MARKETING COMMUNICATIONS
- OUR POLICY TOWARDS CHILDREN
- EXTERNAL LINKS
- CHANGES TO THE PRIVACY POLICY

We may revise this Privacy Policy from time to time, with or without notice to you. If we do so, the new version of this Privacy Policy will be posted on this page.

This Privacy Policy may be published in different languages. If there are any inconsistencies between the versions, the English language version will prevail.

WHO WE ARE AND HOW TO CONTACT US

who are we

Enterprise Solutions Worldwide FZ-LLC (Distress Sales) operates the Platform and is therefore the controller of your personal data (referred to as either “ **Distress Sales** ” , “ **we** ” , “ **us** ” or “ **our** ” in

this Privacy Policy). Our address 1008, Al Moosa Tower1, Sheikh Zayed Road, Dubai, United Arab Emirates.

How to contact us

You can contact us via email: privacy@distresssales.com .

PERSONAL DATA WE COLLECT FROM YOU

The personal data we collect directly from you is set out in the table below.

“ **Personal Data** ” is information about an individual that directly or indirectly identifies that individual, and does not include **anonymized** data (information in which the individual’s identity has been permanently removed). However, it does include “**pseudonymized data**” (information that does not identify an individual on its own, but when combined with additional information, can be used to identify an individual).

Personal data category	What does that mean
Identity data	First name, last name, username or similar identifier and profile picture. If you decide to verify your account using Distress Sales Verify, we will also process a copy of your ID with all the information contained therein (including ID number, date of birth, nationality and gender). We use robust measures to keep this information secure to prevent fraudulent or malicious actions such as identity theft, phishing, non-delivery and payment fraud.
Contact Data	Email address and phone number(s).
Site data	Approximate location if you have this feature enabled on your device.
Listing data	Details of your past and current listings on the Platform, as well as details of other users' listings you have viewed, and offers you have made to other users' listings.
Marketing data	Your preferences in receiving marketing messages from us.
Chat data	Details of messages you exchange with other users of the Platform through the Chat feature, including any additional personal data you may disclose in such messages.
Call data	Recordings of calls between you and our teams, which are recorded for monitoring and training purposes.
Behavioral data	Information inferred or assumed about your behavior and interests based on your activity on the Platform. These are often collected and

	aggregated into “segments” on an aggregate basis.
Technical Data	Internet Protocol (IP) address, login data, browser type and version, time zone and location settings, browser add-on types and versions, operating system and platform and other technology on the devices you use to access this Site or use our Services.

Aggregated Data

We also collect, use and share “Aggregated Data,” such as statistical or demographic data, for a number of purposes. Aggregated Data may be derived from your Personal Data, but once aggregated, it does not constitute Personal Data because this data does not directly or indirectly identify you. For example, we may aggregate your behavioural data to calculate the percentage of users accessing a particular feature of the Platform. However, if we combine or associate Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the aggregated data as Personal Data, which will be used in accordance with this Privacy Policy.

Special categories of personal data

We do not intentionally collect any “special categories of personal data” about you (which includes, for example, details about your race or ethnic origin, religious or philosophical beliefs, political opinions, information about your health, genetic and/or biometric data, and information about your crimes and convictions).

We advise you not to share any of this data with us (for example, through our support chat function) or with other users of the Platform (for example, through our user-to-user chat function). However, if you choose to share this data with us or with other users of the Platform, you consent to us processing this data in accordance with this Privacy Policy.

What happens if I refuse to provide the necessary personal data?

You do not have to provide any personal data to us. However, where *we need* to process your personal data either to provide you with access to the Platform or to comply with applicable law, if you do not provide that personal data when requested, we may not be able to provide you with access to the Platform. For example, *we need* your email address to register your account on the Platform.

PERSONAL DATA WE COLLECT FROM OTHER SOURCES

In addition to the personal data we collect directly from you (as described in the section immediately above this section), we also collect some of your personal data from third party sources. These sources are set out in the table below.

External sources	Personal data categories
Social media platforms	<ul style="list-style-type: none"> • Identity data • Contact Data
Our Affiliates	<ul style="list-style-type: none"> • Identity data • Contact Data • Marketing data
Analytics Service Providers	<ul style="list-style-type: none"> • Behavioral data • Technical Data
Advertisers	<ul style="list-style-type: none"> • Behavioral data • Technical Data

HOW AND WHY WE USE YOUR PERSONAL DATA

We will only use your personal data for the purposes for which we collected it as set out below, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will update this Privacy Policy and explain the legal basis which allows us to do so (please see the “Changes to this Privacy Policy” section below).

What is the “legal basis” for our processing of your personal data?

For each purpose for which we use your personal data, applicable privacy laws require us to ensure that we have a “legal basis” for that use. Most often, we will rely on one of the following legal bases:

- Where we need to process your personal data to fulfil our contractual obligations to you (for example, to provide you with access to the Platform) (“ **Contractual Necessity** ”).
- Where we need to process your personal data to comply with our legal or regulatory obligations (“ **Compliance with Law** ”).
- When we obtain your consent to process your personal data for a specific purpose (“ **Consent** ”).

We have set out below, in table form, the legal bases we rely on when processing your personal data.

The Purpose	Personal Data Categories	Reasons
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Create an account	<ul style="list-style-type: none"> Identity data Contact Data	To register you as a user on the platform and manage your user account.
Verification	<ul style="list-style-type: none"> Identity data Contact Data	To verify your account through “Distress Sales Verification” if you choose to do so.
Platform operation	<ul style="list-style-type: none"> Identity data Contact Data Site data Listing data Chat data Call data	<p>To operate the Platform and enable your use of the Platform, including by allowing you to interact with other users of the Platform.</p> <p>To provide other services you have requested from us (including, for example, arranging a test drive through Distress Sales Cars).</p>
Analytics	<ul style="list-style-type: none"> Behavioral data Technical Data	To understand how you and other users use the Platform and to segment users into groups for marketing purposes.
Marketing	<ul style="list-style-type: none"> Contact Data Marketing data	To send you marketing messages, after you have consented to receive them.
Find the mistakes and resolve it	Technical Data	To track and address issues that may occur on our platform.
Fraud prevention	<ul style="list-style-type: none"> Identity data Contact Data	To keep our platform and associated systems up and running.

WHO WE SHARE YOUR PERSONAL DATA WITH

The table below explains who we may share your personal data with and why we share it.

We require all recipients of your personal data to implement appropriate security measures to adequately protect it, in accordance with our policies and any data security obligations that apply to us. We do not allow third party service providers who process your personal data on our behalf to use it for their own purposes, and we only permit them to process your personal data for specific purposes in accordance with our instructions.

Recipients	Why do we share it?
Other users of the platform	<p>We need to share some of your personal data with other users of the Platform when you wish to interact with them through the Platform.</p> <p>By placing an ad or submitting a review/rating on our Platform, that information and any personal data associated with your account profile (including your username, profile picture and Distress Sales verification status) will be publicly available, and may be copied and shared externally</p>

	by all other users of our Platform. This information may also appear in third party search engine results (e.g. Google search results). Please ensure that you are happy to make this information publicly available before submitting it on our Platform.
Service Providers	Our service providers provide us with a range of services necessary to operate the Platform (for example, information technology, system administration services, or marketing services), and may have access to your personal data as a result.
Our Affiliates	Distress Sales is part of the Distress Sales Group, which operates other consumer platforms and shares technology with Distress Sales. Our affiliates may request access to your personal data as they help us operate the platform and manage user data.
Professional Consultants	Our lawyers, bankers, auditors, insurers and other advisers may request limited access to your personal data when they provide us with consulting, banking, legal, insurance and accounting services.
Public authorities	Public authorities may require us to disclose user data to them under certain circumstances, where required by law (for example, in the case of a police investigation).
Acquirer(s)	We may share your Personal Data with third parties in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, so that any potential acquirer(s) may continue to operate the Platform. In such event, we will ensure that any recipient(s) will continue to use your Personal Data in accordance with this Privacy Policy.

Data transfers

We may transfer your personal data to territories outside the country in which you are located which may not be considered to provide the same level of data protection as your home country, as necessary for the purposes set out in this Privacy Policy. We will always ensure that any cross-border transfers of your personal data comply with applicable requirements.

HOW WE KEEP YOUR PERSONAL DATA SECURE

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, altered, used or accessed in an unauthorised way.

We limit access to your personal data to those employees and other employees who have a business need to have such access. All such persons are subject to a contractual duty of confidentiality.

We have put in place procedures to deal with any actual or suspected personal data breach. Should any such breach occur, we have systems in place to mitigate any impact on your privacy and work with the relevant regulatory authorities.

HOW LONG DO WE STORE YOUR PERSONAL DATA?

We will only retain your personal data for as long as we reasonably need to use it for the purposes set out in this Privacy Policy, unless we need to retain it for a longer period under applicable law (for example, for regulatory purposes).

In some circumstances, we may anonymize your personal data so that it can no longer be associated with you. We may retain this anonymized data indefinitely.

Our data retention policies are reviewed at regular intervals and comply with all applicable requirements.

YOUR RIGHTS REGARDING YOUR PERSONAL DATA

Your rights

In some circumstances, you may have certain rights in relation to your personal data. For example, you may have the right to:

- **Request access to your personal data:** This request allows you to receive a copy of the personal data we hold about you, and to check that we are lawfully processing it.
- **Request correction of your personal data:** This allows you to request correction of any incomplete or inaccurate information we hold about you.
- **Request erasure of your personal data:** This allows you to ask us to delete or remove your personal data from our systems where there is no good reason for us continuing to process it.
- **Object to the processing of your personal data:** This allows you to object to our processing of your personal data for a specific purpose (e.g. for marketing purposes).
- **Request to transfer your personal data:** This allows you to request that we transfer your personal data in a structured, commonly used and machine-readable format, either to you or to another party you specify.
- **Withdraw your consent:** This right only exists where we rely on your consent to process your personal data. If you withdraw your consent, we may not be able to provide you with access to certain features of our Platform. We will let you know if this is the case when you withdraw your consent.

Please note that not all of the above rights may be available to you, and some rights may only be exercisable in certain circumstances.

How to exercise your rights

If you wish to exercise any of the rights listed above, please contact us.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that your personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all valid requests within one month of receiving them. Occasionally it may take longer than a month if your request is particularly complex or if you have made several requests, in which case we will notify you and keep you updated on your requests.

Although we will not normally charge a fee for exercising your rights described above, we reserve the right to charge a reasonable fee in some circumstances (for example, if your request is unreasonable or if you make an excessive number of requests).

Complaints

If you wish to make a complaint regarding this Privacy Policy or our practices in relation to your personal data, please contact us. We will respond to your complaint as soon as possible.

If you are not satisfied with our response to any issue you raise with us, you may have the right to lodge a complaint with your country's data protection authority.

MARKETING COMMUNICATIONS

You can ask us to stop sending you marketing messages at any time by logging into the Platform and checking or unchecking the relevant boxes to adjust your marketing preferences, or by following the “unsubscribe” link at the bottom of any marketing email you receive from us.

OUR POLICY TOWARDS CHILDREN

This Platform is not intended for use by minors, and we do not regularly monitor the ages of our users.

However, if you become aware that a minor is using the Platform in violation of this restriction, please contact us if you would like us to remove his or her personal data from our systems.

EXTERNAL LINKS

This Platform may contain links to third-party websites and apps. Clicking on these links will take you off the Platform and may allow third parties to collect or share your personal data. We do not control third-party websites and apps and are not responsible for their privacy practices. We recommend that when you leave our Platform, you read the privacy policy of each website and app you visit.

CHANGES TO THE PRIVACY POLICY

We reserve the right to update this Privacy Policy at any time, with or without notice to you.

In this case, we will update this page to display the revised Privacy Policy and may also notify you in certain circumstances (for example, via email).

Any changes to this Privacy Policy will be effective immediately upon posting on this page.”