**ASHRI Privacy Policy**

1. **Introduction**

**ASHRI** respects your privacy and is committed to protecting Data. This Privacy Policy will inform you as to how we look after Data when you visit and use our website (hereinafter referred to as” Platform”) (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

1. **Glossary**

**You OR Your:** shall refer to the users of our Platform.

**Data:** the information that we collect from you while using the Platform.

**Service:** means the services provided through **ASHRI’s** Platform.

1. **Important information and who we are**
   1. **Purpose of this Privacy Policy**

This Privacy Policy aims to give you information on how **ASHRI** Collects and processes Data through your use of our Platform, including any Data you may provide through this Platform when you register and/or use our Services, as well as install and sign up to our Platform.

This Platform is not intended for children who are below 18 years old, and we do not knowingly collect Data relating to children.

It is important that you read this Privacy Policy along with our Terms and Conditions when we are collecting or processing Data about you so that you are fully aware of how and why we are using this Data. This Privacy Policy supplements other notices and Privacy Policies and is not intended to override them.

* 1. **Controller**

**ASHRI اشرى للتكنولوجيا LLC** is the controller and responsible for Data (referred to as " **ASHRI** ", "we", "us" or "our" in this Privacy Policy). **ASHRI** is the controller and responsible for this Platform.

If you have any questions about this Privacy Policy, please contact us using the details set out below.

* 1. **Contact details**

If you have any questions about this Privacy Policy or our privacy practices, please contact us through the email address:

E-mail address: ashriapp@outlook.com

* 1. **Changes to the Privacy Policy and your duty to inform us of changes**

We keep our Privacy Policy under regular review. It is important that the Data we hold about you is accurate and current. Please keep us informed if Data changes during your relationship with us.

* 1. **Third-party Links**

This Platform may include links to third-party applications, plug-ins, and platforms. Clicking on those links or enabling those connections may allow third parties to collect or share Data about you. We do not control these third-party applications/platforms and we are not responsible for their privacy statements. We recommend for you read the Privacy Policy of every application/platform you visit.

1. **Data that we collect**

Data means any information about an individual from which that person can be identified. It does not include Data where the identity has been removed (anonymous Data).

We **may collect,** use, store and transfer different kinds of Data about you, which is including, but are not limited to the following:

1. Identity Data includes first name, maiden name, username or similar identifier, date of birth, and gender.
2. Contact Data includes e-mail address and mobile number.
3. Financial Data includes bank account and payment card details.
4. Technical Data includes your login data, browser type, and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Platform.
5. Profile Data includes your username and password, your interests, preferences, purchasing power, reviews and ratings, feedback, and survey responses.
6. Usage Data includes information about how you use our Platform.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from Data but is not considered data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific platform feature. However, if we combine or connect aggregated data with Data so that it can directly or indirectly identify you, we treat the combined data as Data that will be used in accordance with this Privacy Policy.

We do not collect any special categories of data (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

1. **If you fail to provide Data**

Where we need to collect Data by law, by using our Platform, and you fail to provide the required Data, we may not be able to perform our Services. We will notify you if this is the case at the time.

1. **How is Data collected?**

We use different methods to collect Data from and about you including through:

6.1 Direct interactions. You may give us your identity, contact, and financial data by filling in forms or by corresponding with us by phone or e-mail, or otherwise. This includes Data you provide when you undertake the following:

1. Create an account on or exploit our Platform.
2. Enter a social competition, promotion, or survey; or
3. Provide us with feedback or contact us.

6.2 Automated technologies or interactions. As you interact with our Platform, we will automatically collect technical data about your browsing actions and patterns. We collect this Data by using cookies, server logs, and other similar technologies.

1. **How we use Data**

We will only use Data when the law allows us to. Most commonly, we will use Data in the following circumstances:

1. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
2. Where we need to comply with a legal obligation.
3. Where we need to set up your account and administrate it.
4. Where we need to carry out surveys.
5. Where we need to personalize content, user experience, or business information.
6. Where you have given consent.

Generally, we do not rely on consent as a legal basis for processing data although we will get your consent before sending third-party direct marketing communications to you via e-mail or text message. You have the right to withdraw consent to marketing at any time by contacting us.

1. **Purposes for which we will use Data**

**A) Performance of our Services:**

We process Data because it is necessary for the performance of our Services through our Platform.

In this respect, we use Data for the following:

* + 1. To prepare a proposal for you regarding the Services we offer;
    2. To provide you with the Services as set in the scope of our Services, or as otherwise agreed with you from time to time;
    3. To deal with any complaints or feedback you may have;
    4. For any other purpose for which you provide us with the Data which we collect.

In this respect, we may share Data with or transfer it to the following:

1. Subject to your consent, independent third parties whom we engage with to assist in delivering the Services to you;
2. Our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, IT, or public relations advisers.
3. Our Data storage providers.

The legal basis for the processing of the aforementioned Data categories is Art. 6 (1) (a) of the European General Data Protection Regulation (GDPR) and Egyptian law no. 151 for the year 2020. Due to the said purposes, in particular, to guarantee security and a smooth connection setup, we have a legitimate interest in processing this Data.

**B) Legitimate interests:**

We also process Data because it is necessary for our legitimate interests, or sometimes where it is necessary for the legitimate interests of a third party.

In this respect, we use Data for the administration and management of our business, marketing purposes, archiving, or statistical analysis.

**C) Legal obligations:**

We also process Data for our compliance with legal obligations which we are under. In this respect, we will use Data for the following:

1. To meet our compliance and regulatory obligations;
2. As required by tax authorities or any competent court or legal authority.

**D) Marketing:**

We will send you marketing about Services we provide which may be of interest to you, as well as other information in the form of alerts, newsletters, notifications for discounts and deals, or functions that we believe might be of interest to you or in order to update you with information which we believe may be relevant to you. We will communicate this to you in a number of ways including by telephone, SMS, e-mail, or other digital channels as appropriate.

**E) Promotional offers from us:**

We may use Data to form a view of what we think you may want or need, or what may be of interest to you. This is how we decide which merchants, products, services, discounts, and deals may be relevant to you.

You will receive marketing communications from us in case of using our Platform, and you have not opted out of receiving these marketing communications.

**F) Third-party marketing:**

1. We will get your express opt-in consent before we share Data with any third party for marketing purposes.
2. You can ask us or third parties to stop sending you marketing messages at any time by logging into the Platform and checking or unchecking relevant boxes to adjust your marketing preferences, or by following the opt-out links on any marketing message sent to you or by [contacting us](#a599551) at any time.

**G) Cookies:**

You can set your browser to refuse all or some browser cookies or to alert you when the Platform set or accesses cookies. If you disable or refuse cookies, please note that some parts of this Platform may become inaccessible or not function properly.

**H) Change of purpose:**

We will only use Data for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at the e-mail address (ashriapp@outlook.com) If we need to use Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**I) Opting out:**

Where you opt-out of receiving these marketing messages, this will not apply to Data provided to us as a result of a redemption of a product/service, warranty registration, product/service experience at a merchant’s online store, or other relevant transactions.

1. **Disclosures of Data**

We may share Data with the parties set out in Article (6) in relation to the specified purposes for which we will use the Data above.

We may share Data with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use Data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of Data and to treat it in accordance with the law. We do not allow our third-party service providers to use Data for their own purposes and only permit them to process Data for specified purposes and in accordance with our instructions.

1. **Data security**

We have put in place appropriate security measures to prevent Data from being accidentally lost, used, or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to Data to those employees, contractors, third-party service providers, and other parties who have a valid need to know. They will only process Data in accordance with our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

1. **Data retention**

How long will we use Data?

We will only retain Data for as long as reasonably necessary to fulfill the purposes we collected it for, including the purposes of satisfying any legal, regulatory, or reporting requirements. We may retain Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation with respect to our relationship with you.

To determine the appropriate retention period for Data, we consider the amount, nature, and sensitivity of the Data, the potential risk of harm from unauthorized use or disclosure of Data, the purposes for which we process Data, and whether we can achieve those purposes through other means, and the applicable legal, regulatory, or other requirements.

When it is no longer necessary to retain Data, we will delete it.

1. **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access Data (or to exercise any of your other rights). This is a security measure to ensure that 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 to improve our Services.

1. **How do we deal with the “right to be forgotten”?**

You have the right to request the erasure of Data that we hold about you in certain circumstances, for example, if it were not acquired for, or has ceased to be necessary for, a lawful purpose. This is known as the right to be forgotten. Where you request that we erase your Data, we will usually only do so where the Data has ceased to be publicly available or where we no longer use it.

**LAWFUL BASIS**

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process Data or for our legitimate interests. We do not use Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Complying with a legal obligation means processing Data where it is necessary for compliance with a legal obligation that we are subject to.

**THIRD PARTIES**

**External Third Parties**

Service providers provide the Services throughout our Platform.

Professional advisers acting as processors or joint controllers including lawyers, bankers, and auditors as the case may be, who provide consultancy, banking, legal, and accounting services.

**YOUR LEGAL RIGHTS**

You have the right to:

Access to Data on our Platform. This enables you to receive a copy of the Data we hold about you and to check that we are lawfully processing it.

Request correction of the Data that we hold about you. This enables you to have any incomplete or inaccurate Data we hold about you corrected, though we may need to verify the accuracy of the new Data you provide to us.

Request erasure of personal data. This enables you to ask us to delete or remove Data where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase Data to comply with local law.

Object to processing of Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts your fundamental rights and freedoms. You also have the right to object to where we are processing Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of Data. This enables you to ask us to suspend the processing of Data in the following scenarios:

• If you want us to establish the Data's accuracy.

• Where our use of the Data is unlawful, but you do not want us to erase it.

• Where do you need us to hold the Data even if we no longer require it as you need it to establish, exercise, or defend legal claims.

• You have objected to our use of Data, but we need to verify whether we have overriding legitimate grounds to use it.

Withdraw consent at any time where we are relying on consent to process Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide the Services to you. We will advise you if this is the case at the time you withdraw your consent.

You will not have to pay a fee to access Data (or to exercise any of the other rights).

How to contact us? If you have any questions about how we use Data, or you wish to exercise any of the rights set out above, please contact us on our contact details mentioned in Section 3.3 of this Privacy Policy.