

Privacy Policy and Cookie Statement – United Arab Emirates

This is the Privacy Policy and Cookie statement of vidaXL DWC-LLC and any of its affiliate entities part of the vidaXL Group (hereafter: "vidaXL"). In this statement we explain in short how vidaXL (the data controller) deals with personal data.

A more detailed explanation can be found below under the header '3. LONG DESCRIPTION'

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1. DEFINITIONS

Here we explain what we mean by specific words and names that we use in this policy.

Webshop: the Web Shop vidaxl.ae and every other by vidaXL appointed Web Shop, URL or application.

Interaction: the use of functions in the Web shop like the Wish List, Checkout, Newsletter Sign Up, My Account, Auctions and Chat.

Web Shop Visitor: a customer visiting the Web Shop for the first time that does *not* interact with the Web Shop.

Web Shop Customer: a customer who interacts with the Web Shop.

Account: the account a customer has to create through the Webshop to be able to place an order.

Privacy Policy and Cookie Statement: vidaXL's Privacy Policy and Cookie Statement.

2. SHORT DESCRIPTION

How do we obtain personal data?

We get personal data from the following sources:

- Through our Webshop vidaxl.ae (hereafter: the "Web Shop")
- Through our Corporate Website corporate.vidaxl.com (hereafter: Corporate Website).
- Through other sales channels where we sell our products
- Through offline contacts, e.g. a call to our customer service

How do we use personal data?

We use personal data for the following purposes:

- To improve our websites
- To improve our marketing
- To deliver orders
- To answer questions

How do we protect personal data?

We make sure personal data is safe with us in the following ways:

- Customer accounts are password protected
- Only strictly necessary personal data can be accessed by authorized personnel of vidaXL
- When we need to share personal data with 3rd parties, we make sure those parties also protect the data

How can you exercise your rights?

Under GDPR, you have certain rights, such as the right of access (to see what data vidaXL holds on them) and the right to be forgotten (to have their data deleted).

vidaXL will follow up such requests, except in situations where this is not possible due to a conflict of right or legal obligation (e.g., right of access of another person or keeping certain data for tax administration).

You can make your request by contacting our customer service using the e-mail address that you provided to us.

3. LONG DESCRIPTION

3.1 Collection of personal data through Webshop

On our Webshop, we use the cookies and other tracking technologies.

In this part, we will explain to you in details what type of data we collect, where and how, what we use it for and what is the legal basis for using this data. We will only use your personal data where we are permitted to do so by applicable law. Under the Federal Decree-Law No.45 of 2021 on the Protection of Personal Data Protection (hereinafter referred to as "PDPL"), there are various grounds which justify the use of your personal information. With regards to the information we collect, the following grounds are applicable:

- **Contract performance:** where your information is necessary to enter into or perform a contract with you;
- **Legal obligation:** where we need to use your information to comply with our legal obligations;
- **Legitimate interests:** where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights;
- **Legal claims:** where your information is necessary for us to defend, prosecute or make a claim against you, us or a third party;
- **Consent:** where you have consented to our use of your personal information (you will have been presented with a consent form or facility in relation to any such use and may withdraw your consent at any time);
- **Public Interest:** not applicable;
- **Protect you:** where the use of your personal information is necessary to protect your interests.

From **Webshop visitors**, we might collect the following information depending on your cookie settings:

Type	Purpose	Legal Basis
Country Viewed products IP-address How you entered our Web Shop Where you leave our Web Shop With what kind of device you visit our Web Shop	To better understand Web Shop Visitors, to load the correct Web Shop to show relevant ads.	Legitimate interest Consent

From **Webshop customer**, we collect the following information:

For Web Shop Customers, we collect the same information as for Web Shop Visitors, supplemented with information the customer shares with us, for example:

Type	Purpose	Legal Basis
Preferences in the Wish List Ordered products Contact information	Providing you with relevant product suggestions	Legitimate interest Contract Performance Consent

Through the **customer account**, we collect the following information:

Type	Purpose	Legal Basis
First and last name E-mail address Password	To create and manage your account To counteract fraud, abuse and/or improper use of your account To show the products you have ordered in your account To optimise claims and to keep track of contact history concerning Web Shop orders and products offered by third parties	Legitimate interest Consent Contract performance

The data is saved at least as long as you have an account with vidaXL.

When you **place an order**, we collect the following information:

Type	Purpose	Legal Basis
Name E-mail address Delivery address Phone number Company name (if applicable) VAT number (if applicable) CoC (Chamber of Commerce) number (if applicable)	To keep you informed about the status of your orders To complete the order/agreement, amongst other things the delivery and so-called after-sales obligations. Billing To improve our service To handle questions and complaints To personalise marketing activities To place orders on behalf of a company	Legitimate interest Contract performance Consent Legal obligation
Company name (if applicable) Name Billing address Phone number	To be shown on the invoice To contact you concerning the finalisation of the order, billing or delivery	Legitimate interest Contract performance Consent Legal obligation

Payment method	<p>To be able to receive payment and to optimise the checkout process</p> <p>To prevent fraud and hacking</p> <p>The selected method of payment and your IP-address are forwarded to the selected Payment Partner, after which they handle the payment</p>	
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When you **pay for your order**, we collect the following data, which is also shared with our payment partners

List of our payment partners available on vidaXL.ae:

- Visa
- MasterCard
- Adyen
- PayPal

Type	Purpose	Legal basis
Email address Company name (if applicable) Name Billing address Delivery address Phone number Order value IP address Order number Device Method of payment	<p>Shared with the selected Payment Partner;</p> <p>To send a payment notification via email;</p> <p>To assess the risk of fraud;</p> <p>To forward the order number via email in case of payment or cancellation of the order;</p> <p>To forward the order value and payment method so that the reception of the payment through the chosen payment method can be verified;</p> <p>To better our services in case of questions about payment, cancellation and refunds;</p> <p>To reduce errors during the payment process, making the experience of ordering more pleasant.</p>	Legitimate interest Contract performance Consent Legal obligation

When you **take part in an auction**, you will need to, in addition to the information necessary to create an account, also create a so-called "bidder nickname". Other customers can also see your bidder nickname.

This bidder nickname will be used in combination with your account- and order information for the following purposes:

- Managing and organising the auctions

- Combatting and checking for fraud, abuse and/or unintended use.

When you **create** your own **Wish List** in our Web Shop and add products to your Wish List **while logged out** they will remain on the list for 30 days.

Amongst other things, the following information might be gathered regardless of whether you are logged in or out depending on your cookie settings:

- IP address
- Web Shop browsing behaviour

If you **add products to your Wish List while logged in** you can always find them under Wish List in My Account.

This data is gathered for marketing purposes so that vidaXL can remember your Wish List when you return to the Web Shop.

3.2 Collection of personal data through reviews and customer satisfaction surveys

You can **review products** from the Web Shop **via My Account**. You can only review a product if you have purchased it.

When you leave a review the following data is gathered so that the order and the correct review can be linked to the correct email address.

Type	Purpose	Legal Basis
Name E-mail address Product Order number	To add the product reviews to the Web Shop To contact the customer in case of possible complaints	Legitimate interest Consent

Through the Webshop you can **review the Web Shop and (the service of) vidaXL**. Here too, you must first have placed an order to be able to leave a review. To assess the service of vidaXL the following data is collected:

Type	Purpose	Legal Basis
Name Residence	Contact customer Complaint handling	Legitimate interest Consent

Via the Web Shop you can leave a review by clicking the "Write a review" or similar link. After this you are forwarded to a third party Web Shop, one of vidaXL's contract partners, that specialises in customer reviews. Through this website, you can place a review after you have agreed to the terms and conditions of the third party. This third party is responsible for the processing of your personal data. In this case,

You can **leave a review about vidaXL via comparison sites** that show vidaXL products and prices. To leave a review the following data is collected:

Type	Purpose	Legal Basis
Email address Name	Contact customers Complaint handling	Legitimate interest Consent

For more information about the collected data you are referred to the privacy policy of the relevant other channel.

After you have placed an order with vidaXL or after you have had contact with vidaXL you can be approached to participate in a **customer satisfaction survey**. This survey is executed by an external party. If you participate in such a customer satisfaction survey, the following (personal) data will be processed:

Type	Purpose	Legal Basis
Contact information E-mail address and/or phone number Experiences with (departments of) vidaXL and/or affiliated businesses Information about a placed or delivered order IP-address	Research into customer service satisfaction concerning (departments of) vidaXL and/or affiliated businesses Improvement of service and processes Handling of questions and/or complaints Checking for abuse (e.g. multiple reviews/experiences by one and the same person)	Legitimate interest Consent

3.3 Collection of personal data through our customer service department

Contact with customer service

If you have questions or complaints about a product you purchased from us via the Web Shop or about the service of vidaXL you can call us, e-mail us or chat with us. You can find the contact information in the Web Shop. It is also possible to use our online complaints form on the Web Shop. If you use the online form, we will ask for (at least) the following (personal) information:

Type	Purpose	Legal Basis
First and last name E-mail address Phone number Order number (optional/if applicable) Description of the nature of your complaint <u>Chat feature:</u>	Handling complaints Provide information	Legitimate interest Consent Contract Performance Legal obligation

only first and last name, e-mail address and the subject of the chat		
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Recording of interactions

Interactions with our customer service can be recorded for training-, evaluation- or quality purposes. In case a phone conversation is recorded, you will be informed of this the moment you contact our customer service by phone and will be able to refuse the recording of your conversation. The (personal) data that is recorded will only be used for the aforementioned purposes.

The recorded phone conversations are stored and secured in such a way that they are not accessible to unauthorized persons and they are never kept longer than needed for the specific purpose.

Third party service

vidaXL uses external parties for part of its customer service interactions.

Newsletters

You can apply for different newsletters, both general and personal. The personal newsletters are sent based on, for example, your personal details and order history, so we can send you more relevant newsletters. If you wish to receive the free digital newsletters sent by vidaXL and partners, we ask, among others, for the following (personal) information.

- Title
- First and last name
- E-mail address

You can unsubscribe from the newsletters at any time by logging into your account and unsubscribing. You can always use the unsubscribe-link in the newsletters.

3.4 What are your rights?

Under data protection legislation, you have rights including:

- **Your right of access** – You have the right to ask us for a copy of your personal information.
- **Your right to rectification** – You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** – You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** – You have the right to ask us to restrict the processing of your personal information in certain circumstances.'
- **Your right to object to processing** (only when based on consent) – You have the right to object to vidaXL processing under certain circumstances.

- **Your right to data portability** – You have the right to ask that we transfer the personal information you gave us to another organization, or to you, in certain circumstances.
- **Your right not to be subject to automated decision making, including profiling:** You have the right to object to decisions issued with respect to Automated Processing that have legal consequences or seriously affect you.

You are not required to pay any fee for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at webservice.en@vidaxl.ae or by phone at 9718000321197 or by mail at Business Center Logistics City, Dubai Aviation City, 390667, Dubai, United Arab Emirates if you wish to make a request.

3.5 Data Processing within vidaXL

The vidaXL-concern has several offices worldwide. These offices work closely together. Employees in our offices only have access to personal data as far as this is required for them to do their job.

vidaXL takes measures to sufficiently **protect** your personal data. To achieve this, we use means that fit our activities, the nature and size of our company, and the sort of data we process. We do this to prevent unauthorized access to, adjustment, disclosure or loss of personal data.

We expect that you also contribute to the safekeeping of your personal data by keeping your login details (e-mail address and password) secret. Never share your login details with anyone and treat them with care.

vidaXL does not **store** your information longer than necessary to achieve the purposes for which your information was collected and used, unless the data has to be stored longer due to legal requirements (such as tax a retention obligation). How long certain data is stored depends on the nature of the data and the purposes for which it is processed. The storage period can therefore differ per purpose.

Because of the global presence of vidaXL, it can happen that your data is processed outside the United Arab Emirates. vidaXL makes sure that your data is well protected within the entire concern implementing appropriate contractual and technical measures.

vidaXL can provide your personal data to **third parties** for the following reasons:

- You have given your express consent for this; or
- The agreement you have with us needs to be executed; or
- Because vidaXL has a collaboration with another party in the context of improving our products and services; or
- An obligation by law; or
- To prevent or fight fraud or potential/suspected fraud;
- If necessary for the business management of vidaXL.

The third parties whom with we may share your personal data operate in sectors critical to the provision of our services such as carriers, payment service providers customer service solutions companies, etc.

Some of the external companies we work with are based outside the United Arab Emirates. For example, we work together with third parties such as Google and Facebook. This means that the data can be stored on servers outside of the United Arab Emirates to Europe or the United States for instance. There is, as such, a possibility your data will be transferred and processed in jurisdiction with different data protection legislation. When transferring this data to third parties, vidaXL ensures to implement and impose obligations on these parties to safeguard your personal data.

This Privacy Policy and Cookie statement is **not applicable to third party Web Shops** that are linked to the Web Shop. Besides that the Privacy Policy and Cookie Statement is also not applicable to data collected by companies such as Google. You can adjust your preferences yourself in your Google account. Consult their [privacy policy](#) for this.

vidaXL can in no way be held accountable or responsible for the way in which third parties and companies deal with your (personal) data. vidaXL always advises that you read the Privacy Policy and Cookie Statements on the relevant Web Shops and from the relevant companies.

4. USE OF COOKIES

4.1 What are cookies?

As with many Web Shops, vidaXL uses cookies and files similar to cookies and technologies such as “web beacons” (hereafter: “Cookies”).

A Cookie is a small text file that is sent with the Web Shop page via your browser, it is then saved on a hard drive of your computer, phone or tablet.

Cookies are for example used to save passwords and personal settings, so that you don’t have to fill those in the next time you visit the Web Shop.

Below it will be explained how the Web Shop uses Cookies, where the Cookies come from and why they are used. For the optimization of our own ads and those from third parties the following data, amongst others, is collected:

- Purchased products
- Viewed products
- Order value
- How did the customer get on the Web Shop

In part 4.2, we will describe how Cookies can be rejected and removed.

4.1.1 Functional Cookies

vidaXL uses Cookies, such as Google Analytics to remember your chosen settings and entered data during your visit to our Web Shop. These Cookies make browsing our Web Shop easier because certain data does not have to be re-entered every time.

In addition, vidaXL can use Cookies that are necessary to make the Web Shop function well, even when you visit the Web Shop on your mobile phone or tablet.

4.1.2 A/B Testing Cookies

vidaXL continuously tests its Web Shop to be able to provide the best user experience. Because of that, vidaXL uses so-called A/B testing Cookies by third parties. With A/B

tests, there are two different variants of the Web Shop, or parts of the Web Shop shown to visitors to determine which one works best. As such, this Cookie determines which version of the Web Shop you see.

4.1.3 Webshop Analysis Cookies

On the Web Shop, Cookies are used that keep track of which pages you have visited. This information is collected, amongst others, by web analysis services Aol (Adserver), Alexa, Crazy Egg, Google Analytics, Pingdom, Hotjar, Piwik, Google Tag Manager, TVSquared and Clarity.

These web analysis services use Cookies to analyse how visitors use the Web Shop. The Cookies are used to save visitor information, such as the time the visit to the Web Shop took place, or whether the visitor has visited the Web Shop before and via which Web Shop the visitor ended up on the webpage.

To optimize the user- and customer experience of our Web Shop, vidaXL uses Hotjar Web Analytics Service. Hotjar can register mouse clicks, mouse movements and scrolling activities. Hotjar also collects information about visited webpages, taken actions, the country you are in, the device you are using and the browser you are working with. Hotjar does not collect any personally identifiable information (PII) that you do not enter voluntarily on the Web Shop. Hotjar also does not follow surfing behavior on Web Shops that do not use their services. Hotjar's privacy statement contains a detailed explanation about how Hotjar is used: <https://www.hotjar.com/privacy>. You can always choose to not have your information gathered by Hotjar when you visit our Web Shop, go to the 'Opt-out' page on the Hotjar Web Shop and click on 'Disable Hotjar' to do so.

The generated information about your Web Shop use is, in most cases, sent to the servers of the relevant web analysis services. The web analysis services use this information to evaluate how you use the Web Shop, to create reports about the Web Shop activities and to offer you other services pertaining to the use of the Web Shop and the internet. vidaXL uses the aggregated data from the reports for further optimising of the Web Shop.

Pingdom is a website performance monitoring tool. It helps us identify bugs and other performance issues. Pingdom does not collect any personally identifiable data. It collects anonymous data on website load times and load orders.

Google Analytics is a website behaviour analysis tool. It does not collect personally identifiable information. IP addresses are masked before they get stored by Google. Google Analytics collects and processes browsing behaviour, allowing us to identify bottlenecks on our website, and troubleshoot any potential issues our customers may encounter. In general, it helps us get a picture of how our customers interact with our website, and we can use that information accordingly to improve our platform.

Google Tag Manager is a tool that manages our cookie placement. It allows us to make quick changes to the way information is sent and received. (for example, we build our 3rd party connections through this tool, and can and will block irrelevant cookies from there).

TVSquared is a tool we use to measure our offline branding efforts. It collects a limited set of browsing behaviour data, and combines that with our offline branding data, to measure the performance and effectiveness of our branding efforts.

Clarity is a similar tool to Hotjar. It has a similar use to Hotjar (mentioned above) in that it specializes in user behaviour on a deeper level. It measures clicks on the different elements on our pages, and collects recordings of user sessions (randomly selected and anonymous). This allows us to get an even better grip on potential issues on our website. Using this tool allows us to find flaws and potential areas that need improving, and allows us to test these improvements afterward.

vidaXL refers to the privacy policy of the relevant web analysis services in which is described how they deal with your (personal) data when their products and services, amongst which web analysis, are being used. .

4.1.4 Affiliate Cookies

On the Website, Affiliate Cookies are used to measure the effectiveness of ads placed on behalf of vidaXL on third party websites. This way the affiliate partner can be rewarded by vidaXL for their online advertising of vidaXL. Through these Cookies it can be checked via which affiliate partner you reached our Web Shop, whether ads are effective and if they did actually lead to a sale in our Web Shop. They do all of this without the exchange of personal data.

In the United Arab Emirates we only have one affiliate partner, namely:

- CJ (<https://www.cj.com/legal/privacy-policy-services-uk>)

4.1.5 Retargeting Cookies

The Web Shop uses retargeting Cookies to show relevant ads to returning visitors of the Web Shop. With these Cookies, a profile of your surfing behavior can be built so that the ads correspond with your interests. The ads are shown on ad partners' Web Shops and on social media. Cookies in this category are Google Ads, Bing Ads, Criteo and IntelliAd.

4.1.5.1 Criteo

Amongst other things, Criteo's retargeting Cookies are used. For more information about the data Criteo collects, we refer you to the [Criteo Privacy Policy](#).

4.1.5.2 Google Ads & Analytics Remarketing

vidaXL uses Google Ads & Analytics remarketing services to show ads on third party Web Shops (including Google) to previous visitors of vidaXL. This can mean that we, for example, show ads to a visitor that has not completed their order, or has just completed their order. The ads can be text- or display ads within the Google Display Network.

All collected data is used in accordance with the Privacy Policy and Cookie Statement from vidaXL and Google's privacy policy. You can set your ad preferences via the [Google Ad Preference page](#).

4.1.5.3 Retargeting Cookies third party Webshops

On third party Web shops (such as online marketplaces), retargeting can also happen. vidaXL Cookies are then used to show relevant ads to previous visitors of these other Web Shops.

4.1.5.4 Facebook, Instagram and Pinterest Advertising and analytics

vidaXL uses Pinterest Ads and Facebook Ads remarketing services to show ads on third party platforms (including Pinterest, Facebook and Instagram) to previous visitors of

vidaXL. This can mean that we, for example, show ads to a visitor that has not completed their order, or has just completed their order.

We share information with Pinterest, Facebook and Instagram from cookies set in the websites' domains, whether or not you have a Facebook account or are logged in. Their purpose is to personalize content (including ads), measure ads, produce analytics and provide a safer experience, as set out in [this Facebook Cookies Policy](#). All collected data (Email address, gender, location, first name and surname, phone number, date of birth, IP) is used in accordance with the Privacy Policy and Cookie Statement from vidaXL and Facebook's privacy policy. You can adjust your ad preferences via the [Facebook Ad preferences](#) or [Instagram Ad preferences](#).

4.1.5.5 RTB House

Amongst other things, RTB House's retargeting Cookies are used. For more information about the data RTB House collects, we refer you to the [RTB House's Privacy Center](#).

4.1.6 Social Media Cookies

On the Web Shop, you can use (for example) social media buttons from Facebook, YouTube, Twitter, Pinterest and Google+.

As soon as you visit a page on the Web Shop that has social media buttons, your browser connects to the relevant social media provider. Through this, the provider obtains information about the pages on the Web Shop you visited with your IP-address.

If you are logged in to Facebook, YouTube, Twitter, Pinterest or Google+ during your visit to the Web Shop, your visit can be linked to your account. If you use the buttons, by clicking the Facebook 'Like'-symbol for example, then the relevant information is sent to and saved by the relevant provider via your browser.

The purpose and scope of the data collected through social media buttons, as well as further processing, the further use and the duration of the storage, are exclusively determined by the providers of the buttons. You can read more about this in the privacy policies of the relevant providers.

4.1.7 Price Comparison Cookies

The Web Shop uses different avenues of advertisement. Aside from affiliates, another popular channel our customers like to use is Price Comparison Websites. These websites aggregate product lists from different websites, and display them in a way the customer can easily compare stores, prices and service levels.

In order to determine the performance of these Price Comparison Websites, we send confirmation of the purchase (if made through their channel) and limited purchase information (amount of products, total transaction amount) to these partners. This allows us to monitor their performance, and adjust accordingly. They do not collect personally identifiable information.

We do not work with any Price Comparison Cookies in the United Arab Emirates at the moment.

4.1.8 Email Cookies

On the vidaXL.ae, Email Cookies are used to measure the effectiveness of commercial e-mails sent by vidaXL. This way we can measure effectiveness and performance of our e-mail campaigns and newsletters. All of this happens without collecting any personal information.

We currently work with an email cookie partner named Clang. We also work with Salesforce Marketing Cloud which will allow you greater control over how you receive notifications.

4.1.9 Data for recommending and optimizing the customer experience

To provide you with a personalized and optimized experience on vidaXL.ae, we use general customer behavior and statistics.

When you view a product on vidaXL.ae, you will also see similar or related products listed under the headings “you may also like” or “recommended combinations”. These recommendations are related to products you are currently or have recently viewed. Additionally, you may see recommendations based on statistical data from customers who have previously purchased the item you are viewing. These recommendations are not personalized and are advertised to all customers who view the product.

4.2 Accepting and Declining Cookies

When you enter vidaXL.ae, a cookie banner appears at the bottom of our website. You can either accept all the cookies (Essential cookies, analytical cookies and marketing cookies) or chose to personalize settings.

If you chose to personalize the settings, you will be able to choose to opt-in to analytical and marketing cookies. If you click on “save settings” without opting in to analytical or marketing cookies, only essential cookies will be used.

Essential cookies cannot be declined as they are strictly necessary to provide the website and its functionality (ex: to allow us to hold items in your cart, to keep your language preferences).

You can also accept or decline Cookies by adjusting your browser settings. Every browser is different, so vidaXL refers you to the information page of your browser or the user manual of your phone for the setting of your Cookie preferences.

If Cookies are completely switched off, it is possible that you cannot use all the functions of the Web Shop. If you use different computers at different locations, you have to make sure that every browser is set to your Cookie preferences.

You can always remove Cookies from the hard drive in your computer, phone or tablet. Consult the information page of your browser or the user manual of your phone or tablet to learn how to do this. Please note: when you disable your cookies completely, it is possible that not all functionalities on the web shop can be used.

5. CHANGES TO THE PRIVACY POLICY

The contents of this Privacy Policy and Cookie Statement can be amended. The most current version can always be found on the vidaXL Web Shop. vidaXL advises that you regularly check this Privacy Policy and Cookie Statement, at least before you provide vidaXL with personal data.

6. HOW TO COMPLAIN?

If you have any concerns or questions about our use of your personal information, you can make a complaint to us at webservice.en@vidaxl.ae

