

MAHALLAK – PRIVACY POLICY

1. Introduction

This Privacy Policy explains how Digital Shopping Oasis Company For E-Marketing LLC (the “Company”, “we”, “us”, or “our”) collects, uses, discloses, and protects personal data in connection with the digital marketplace platform operated by the Company under the name “Mahallak” (the “Platform”).

Mahallak is a technology-based platform that facilitates connections between customers, independent vendors, and independent delivery providers for the purpose of enabling the purchase and delivery of goods.

This Privacy Policy applies to all users of the Platform, including:

- customers
- vendors
- delivery providers (“Captains”)

By accessing, registering, or using the Platform, you acknowledge that you have read and understood this Privacy Policy.

If you do not agree with this Privacy Policy, you must not use the Platform.

2. Information We Collect

We collect different types of information depending on your interaction with the Platform and your role as a customer, Vendor, or delivery provider (“Captain”).

2.1 Information You Provide

Customers

We may collect information including:

- full name
- phone number
- delivery addresses

- account login credentials
- order details and purchase history
- communications with customer support

Vendors

We may collect information including:

- business name and business-related details
- contact information
- identification or licensing information (where applicable)
- bank or payout details (including IBAN and/or CliQ)
- product listings, descriptions, images, and pricing data

Delivery Providers (Captains)

We may collect information including:

- full name and contact details
- identification documents
- certificate of good conduct / no criminal
- driver's license details
- vehicle information and registration details
- bank or payout details
- delivery activity and performance data

2.2 Automatically Collected Information

When you access or use the Platform, we may automatically collect certain technical and usage data, including:

- device type, operating system, and device identifiers
- IP address and network information
- usage activity and interaction data
- timestamps of actions performed on the Platform
- log data and diagnostic information

2.3 Location Information

We may collect and process location data to enable core functionality of the Platform.

This may include:

- real-time location data of delivery providers (Captains) during active use of the Platform
- location data used to facilitate delivery tracking for customers
- general location information derived from device settings or IP address

Location data is used for purposes including:

- order fulfillment and delivery coordination
- route optimization and operational efficiency
- improving platform performance and user experience

2.4 Communications Data

We may collect and store information related to communications made through the Platform, including:

- messages between users (where applicable)
- customer support inquiries and responses
- interaction history with notifications or system messages

2.5 Verification and Compliance Data

We may collect additional information where necessary for verification, compliance, or safety purposes, including:

- identity verification data
- onboarding documentation for Vendors and delivery providers
- fraud detection and prevention data

Mahallak collects only the information necessary to operate, improve, and secure the Platform and to fulfill its legal and operational obligations.

3. How We Use Information

We use the information we collect for legitimate business and operational purposes, including:

3.1 Platform Operation

- to create and manage user accounts
- to enable Vendors to list and sell products
- to allow customers to browse, place orders, and complete transactions
- to enable delivery providers (Captains) to accept and fulfill delivery requests

3.2 Order Processing and Delivery

- to process orders and facilitate transactions between customers and Vendors
- to coordinate delivery services between Vendors, customers, and delivery providers
- to provide order tracking, updates, and delivery status

3.3 Payments and Settlements

- to facilitate payment collection and settlement processes
- to calculate and process payouts to Vendors and delivery providers
- to manage refunds, reversals, and financial adjustments

3.4 Communication

- to send transactional messages, confirmations, and updates
- to respond to inquiries and provide customer support
- to send service-related announcements and operational notifications

3.5 Safety, Fraud Prevention, and Compliance

- to detect, prevent, and investigate fraud, abuse, or unauthorized activity
- to verify user identity and maintain platform integrity
- to enforce this Privacy Policy and related agreements
- to comply with legal obligations and regulatory requirements

3.6 Platform Improvement and Analytics

- to analyze usage patterns and user behavior

- to improve platform functionality, performance, and user experience
- to develop new features, services, or operational processes

3.7 Enforcement and Protection

- to enforce our terms, policies, and operational standards
- to protect the rights, safety, and property of the Company, users, and third parties
- to investigate disputes and resolve issues arising on the platform

We use personal data only to the extent necessary to operate, maintain, and improve the Platform, and to fulfill our legal and operational obligations.

4. Sharing of Information

We may share personal data only where necessary to operate the Platform, fulfill transactions, comply with legal obligations, or protect our rights and users.

4.1 Sharing Between Platform Users

To enable core functionality of the Platform, certain information is shared between users:

- **Customers → Vendors and Delivery Providers**
Information such as name, contact details, and delivery address may be shared to facilitate order preparation and delivery.
- **Vendors → Customers**
Business information, product details, and relevant contact information may be shared in connection with transactions.
- **Delivery Providers (Captains) → Customers**
Limited identifying and contact information may be shared to enable delivery coordination.

4.2 Service Providers

We may share information with third-party service providers that support the operation of the Platform, including:

- payment processors and financial service providers

- hosting, cloud, and infrastructure providers
- analytics and performance monitoring services

Such providers are authorized to use the information only as necessary to perform services on our behalf.

4.3 Legal and Regulatory Requirements

We may disclose personal data where necessary to:

- comply with applicable laws, regulations, or legal processes
- respond to requests from courts, regulators, or government authorities
- enforce our agreements, policies, or legal rights
- protect the safety, rights, or property of the Company, users, or third parties

4.4 Business Transfers

In the event of a merger, acquisition, restructuring, sale of assets, or other business transaction, personal data may be transferred as part of such transaction, subject to applicable confidentiality and legal safeguards.

4.5 Protection of the Platform

We may share information where necessary to:

- investigate fraud, abuse, or security incidents
- enforce platform rules and policies
- prevent harm to users or the integrity of the Platform

We do not sell personal data to third parties. Any sharing of information is limited to what is necessary for the purposes described in this Privacy Policy.

5. Cookies and Tracking Technologies

The Platform may use cookies and similar tracking technologies to enhance functionality, analyze usage, and improve user experience.

Cookies are small data files stored on your device that help the Platform recognize your device and remember certain information.

We may use cookies and similar technologies for purposes including:

- maintaining user sessions and authentication
- remembering user preferences and settings
- analyzing usage patterns and platform performance
- improving functionality and user experience

In addition to cookies, we may use technologies such as device identifiers, local storage, and analytics tools to collect and process usage data.

You may control or disable cookies through your device or browser settings. However, disabling cookies may affect the functionality and availability of certain features of the Platform.

By using the Platform, you consent to the use of cookies and similar technologies as described in this Privacy Policy.

6. Location Data

We may collect and process location data to enable essential functionality of the Platform, particularly in relation to order fulfillment and delivery services.

6.1 Types of Location Data

We may collect:

- real-time location data of delivery providers (“Captains”) while actively using the Platform
- location data used to enable customers to track deliveries
- general location information derived from device settings or IP address

6.2 Purpose of Location Data

Location data is used to:

- facilitate and coordinate deliveries between Vendors, Captains, and customers

- provide real-time order tracking and delivery updates
- optimize routes and improve delivery efficiency
- enhance operational performance and user experience

6.3 Control and Permissions

Location data is collected only where enabled through your device settings or as required for the use of specific Platform features.

You may control or disable location permissions through your device settings. However, disabling location services may limit or prevent certain features of the Platform from functioning properly.

6.4 Limitation of Use

Location data is used solely for operational purposes related to the Platform and is not used for unrelated tracking or purposes beyond those described in this Privacy Policy.

7. Data Retention

We retain personal data only for as long as necessary to fulfill the purposes described in this Privacy Policy, unless a longer retention period is required or permitted by applicable law.

Data may be retained for purposes including:

- operating and maintaining the Platform
- completing transactions and processing payments
- complying with legal, regulatory, and tax obligations
- resolving disputes and handling claims
- enforcing agreements, policies, and platform rules
- detecting and preventing fraud or abuse

Retention periods may vary depending on the type of data, the nature of the user relationship, and operational or legal requirements.

When personal data is no longer required for the purposes described above, we may:

- delete the data

- anonymize or aggregate the data so that it can no longer be associated with an individual

We may retain certain information for a reasonable period after account closure or termination where necessary to comply with legal obligations or protect our rights and interests.

8. Data Security

We implement appropriate technical and organizational measures designed to protect personal data against unauthorized access, loss, misuse, alteration, or disclosure.

Such measures may include:

- access controls and authentication mechanisms
- secure data storage and encryption where appropriate
- monitoring systems to detect and prevent unauthorized activity
- internal policies governing data handling and access

Access to personal data is restricted to authorized personnel and service providers who require such access for operational purposes and are subject to confidentiality obligations.

While we take reasonable steps to safeguard personal data, no method of transmission over the internet or method of electronic storage is completely secure. Accordingly, we cannot guarantee absolute security of any information.

You are responsible for maintaining the confidentiality of your account credentials and for any activity conducted under your account.

In the event of a security incident or data breach, we may take appropriate actions, including investigation, mitigation, and notification where required by applicable law.

9. Your Rights

Depending on applicable laws and regulations, you may have certain rights in relation to your personal data.

These may include the right to:

- request access to the personal data we hold about you
- request correction of inaccurate or incomplete information
- request deletion of your personal data, subject to legal and operational requirements

- object to or request restriction of certain types of data processing
- withdraw consent where processing is based on consent

To exercise any of these rights, you may submit a request through the Platform's official communication channels.

We may require verification of your identity before processing any such request.

We reserve the right to:

- refuse or limit requests where permitted by applicable law
- retain certain data where necessary for legal, regulatory, or operational purposes
- charge a reasonable fee where requests are excessive, repetitive, or unfounded

Requests will be handled within a reasonable timeframe, subject to the nature and complexity of the request.

Nothing in this section shall require Mahallak to delete or modify data that must be retained to:

- comply with legal or regulatory obligations
- complete ongoing transactions
- resolve disputes or enforce agreements
- prevent fraud, abuse, or misuse of the Platform

10. Third-Party Services

The Platform may include integrations with or links to third-party services, applications, or websites that are not operated or controlled by the Company.

Such third-party services may include, but are not limited to:

- payment processors and financial service providers
- analytics and performance monitoring tools
- communication or notification services
- external websites or applications accessed through the Platform

These third parties may collect, process, or store personal data in accordance with their own privacy policies and practices.

Mahallak does not control and is not responsible for:

- the privacy practices or policies of third-party services
- the content, functionality, or security of third-party platforms
- any data collected or processed independently by such third parties

We encourage you to review the privacy policies of any third-party services you interact with through the Platform.

Your use of third-party services is at your own risk and subject to the terms and policies of those third parties.

11. International Data Transfers

Your personal data may be processed, stored, or transferred to locations outside the Hashemite Kingdom of Jordan where necessary for the operation of the Platform.

This may include transfers to:

- cloud storage and hosting providers
- payment processors and financial service providers
- analytics and technology service providers

Such locations may have data protection laws that differ from those in your jurisdiction.

By using the Platform, you acknowledge and agree that your personal data may be transferred to, stored, and processed in such locations.

The Company takes reasonable steps to ensure that any such transfers are conducted in accordance with applicable legal requirements and that appropriate safeguards are implemented to protect personal data.

These safeguards may include contractual obligations, data protection measures, or reliance on reputable service providers.

However, the Company does not guarantee that the level of data protection in all jurisdictions will be equivalent to that of your country.

12. Children's Privacy

The Platform is not intended for individuals who are not legally capable of entering into binding agreements under applicable law.

We do not knowingly collect or solicit personal data from such individuals.

If we become aware that personal data has been collected from an individual who is not legally permitted to use the Platform, we may take appropriate action, including:

- deleting the data
- restricting or terminating the associated account

If you believe that we may have collected personal data from such an individual, you may contact us through the Platform's official communication channels.

Users are responsible for ensuring that they meet the legal requirements to use the Platform.

13. Changes to This Privacy Policy

The Company reserves the right to update, modify, or replace this Privacy Policy at any time, at its sole discretion.

Any changes may be communicated through:

- in-app notifications
- email
- platform announcements
- or any other reasonable means of communication

Unless otherwise stated, such changes shall become effective upon publication or communication.

Your continued access to or use of the Platform after such changes constitutes acceptance of the updated Privacy Policy.

If you do not agree with any changes, you must cease using the Platform and may request account termination.

We encourage you to review this Privacy Policy periodically to stay informed about how your information is handled.

14. Contact

If you have any questions, concerns, or requests regarding this Privacy Policy or the handling of your personal data, you may contact Digital Shopping Oasis Company For E-Marketing LLC through the official communication channels available on the Platform.

The Company may, from time to time, provide additional contact methods, including but not limited to:

- in-app support channels
- email addresses
- customer support lines

You acknowledge that the availability and form of such contact methods may change at the Company's discretion.

Nothing in this section shall be construed as obligating the Company to provide support beyond what is reasonably offered through the Platform.