

# Privacy Policy

## **Dwisi's approach to privacy**

The Dwisi app ("App") and website ("Site") are run by **Dwisi LLC** a company established in the UAE (company License 2010184.01) . We are committed to protecting and respecting your privacy.

Dwisi provides a social media-inspired peer-to-peer marketplace which uses artificial intelligence to suggest relevant sellers and items and to display items to the most relevant potential buyers based on user preferences and other information submitted to it, which you can access via the App and through our website ("Service"). You can search for items, log-in to your profile and view other profiles (each shop has a unique and public URL) via the website. The above information will also be visible to search engines, including but not limited to the photos that you post. When you use our Site or Service we will collect and process certain information about you. This Privacy Policy sets out how Dwisi collects, uses and shares information that identifies you or is associated with you ("personal information"). Our main goal in collecting such data is to provide you with a safe, efficient and personalised experience, and we will only collect information relating to you that we deem necessary for this purpose.

By setting up an account with us or using and accessing the Site or Service, you consent to the use of your personal information as described in this Privacy Policy. You should also be aware that we use cookies to store and access information whilst providing the Site and Service. You can find out more about our use of cookies in our [Cookie Policy](#).

. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights please contact our Data Protection Officer using the details set out below:

Email address: [privatepolicy@dwisi.com](mailto:privatepolicy@dwisi.com)

## **Personal information we collect about you and how we use it**

We collect information from you when you voluntarily submit it to us and when you use the Site and Service. This can include information you provide when you register to use the Service, complete a form, list an item, subscribe to our mailing lists or other marketing communications or take an action on the Service (such as when you comment on or like an item, perform a search, communicate with other users of the Service, or engage in a transaction).

We also collect information about the pages you look at on our Site and Service and/or the device you use to access the Site and Service.

The list below sets out categories of personal information we collect about you and how we use that information. Unless we specifically state below that we are relying on your consent, our

legitimate interests or a legal obligation to process your personal information, the lawful basis we are relying on to process your personal information is to perform a contract with you. This contract is governed by our Terms of Service. We will only rely on legitimate interests to process your personal information where your interests and fundamental rights do not override our interests.

Where we state below that we use your information to send you marketing communications, we may do so on the basis it is in our legitimate interests (where you are an account holder and we are informing you about our products and services), where we provide you with an opt-out option, or because you have consented to receiving such marketing communications from us. We will only send you marketing communications in accordance with your marketing preferences.

**Contact and identity details:** When you open an account with us you will be asked to provide us with your contact information such as your name, your email address, your telephone number and addresses associated with your account. We will use your contact details so that we can communicate with you directly about the products you purchase and that you sell through the Service and about queries, issues or concerns you or other users have and to send you marketing communications. As a necessary part of participating in the Service, you will also share your contact details with any buyer or seller you deal with through the Service. We may also ask you to provide copies of identification documents which we will also use along with other contact information you provide for the legitimate interests of verifying your details and helping prevent fraudulent access to the Service or use of your account.

**Comments and opinions:** When you contact us directly, e.g. by email, phone, post or by completing an online form we will record your comments and opinions. We will also record comments and opinions you express when responding to surveys, entering competitions, taking part in promotions we run or that you post on our community boards or other message areas. We will use your comments and opinions in the legitimate interests of addressing your queries, issues and concerns and improving our products and services. We will also use comments and opinions you express when posting on our community boards or other message areas, responding to surveys, entering competitions or taking part in other promotions, to determine products and services that may be of interest to you and to send you marketing communications.

**In-app messages:** If you choose to use our in-app messaging functionality to message other users of the Service, we may access and review your messages to assist in the fulfilment of orders made through the Service, to respond to any query, issue, concern or dispute users raise and to resolve such disputes and if we have reason to believe the messages may contain evidence that you have breached our Terms of Service.

**Payment and transaction information:** We keep records of the products you buy, sell or exchange through the Service and the payment method you use for the transaction. We will use payment and transaction information to assist in the payment process for any product you purchase through the Service. We will use your payment and transaction information and history to determine products and services that may be of interest to you and send you marketing. We

will provide your contact details to the seller of any item you purchase including your username and the name, delivery address, email address and phone number you provide at the checkout.

In order to transfer funds and process refunds in connection with a transaction via \*\*, you agree to provide Dwisi accurate and complete information about you and your Dwisi account. By using the payment services provide by TBD, you hereby authorize Dwisi to pass to TBD any information and payment instructions you provide (which may include name, email address, unique customer identifier, order ID, bank account details, payment card details, card expiration date, CVC code, date/time/amount of transaction, merchant name/ID and location) to the extent required to complete payments via the Service. In addition where you elect to use TBD, limited members of our support and moderation team may have access to your name, date of birth, address, and last 4 digits of the relevant bank card, in order to process and support transactions and moderate refunds. TBD may collect information about your use of TBD, including information collected by way of cookies or other similar means, to the extent this is necessary to process the transactions or to satisfy security requirements.

**Information provided by social networks you connect or link to our Service:** If you choose to connect an account on a social network, such as Facebook, Twitter or Instagram to your Dwisi account you are consenting to us collecting personal information from the social network in accordance with your privacy settings on that social network. The connected social network may provide us with information such as your name, Facebook id, Twitter handle, profile picture, gender, username, user ID, age or age range, language, country, friends list, follower list and any other information you have agreed it can share. We will use the personal information provided to help create a public profile for you on our Service and, where we provide the functionality, we will also use the information provided to assist you in sharing your experiences on our Service with your friends, followers or contacts on the connected social network. We may also use the connection between the social network and our Service to provide you with updates on the social network that are relevant to any account you have with us or promotion you are taking part in. Such updates will only be provided with your consent. We will not post to your social network or to your friends, followers or contacts without your consent.

**Your relationships with other users:** We may collect information regarding other users that you are following on our Service which we use to prioritise items displayed to you in your search results or your timeline based on Dwisi's internal algorithm and to determine other products and services that may be of interest to you. We also store information regarding any blocked or banned relationships associated with your account in the legitimate interests of enforcing our Terms of Service and managing user preferences regarding who they wish to communicate with on our Service.

**Website and app login details:** Where you create an account with us we will hold your user name and password details in the legitimate interests of keeping your account secure. Where you are provided with the option to log-in using a social network, for example through Facebook sign- in, we will not be provided with your password or other account login details for those accounts. We will also collect device ID (Android ID, Apple ID, or your browser fingerprint). Browser fingerprints are based on your device type and browser type (including settings and

version). Dwisi shall only use the above information in the legitimate interests of keeping your account secure.

You are responsible for all actions taken with your user name and password, and we recommend that you do not disclose your user name and password to any third parties. If you lose control of your password, you may lose substantial control over your personally identifiable information and may be subject to legally binding actions taken on your behalf, so you should change such password immediately and notify us of any unauthorised access to your account.

**Your preferences:** We hold information about the preferences you set for notifications, marketing communications and how our site is displayed or what content is displayed to you through our Service. We will use your preference settings for the purpose of providing notifications, sending marketing communications and displaying our Service in accordance with your choices.

**Information about how you connect to and use our Site and Service:** We collect information about how you use our Site and Service such as the pages you view on our Site and Service, the time you access our Site and Service and how long you use it for, the website from where you came to our Site or go to after leaving our Site (if applicable) and any selections and choices you make when using our Site and Service. We also collect information about any items you have searched for, listed, purchased, sold, bookmarked, liked or shared on the Site and Service.

We, and our third party analytics providers, process this data for the following purposes:

- to provide analytics data on the use of the Service, Site and App which we use for the legitimate interests of improving our Service, Site and App;
- to show you your timeline and search results on our Service and order such results in a way that is relevant to you using Dwisi's internal algorithm based on your preferences and, where you have consented to us using your location data, your location;
- to display your items to the most relevant potential buyers using Dwisi's internal algorithm;
- to send you tips and other notifications where we think this will improve your user experience of the Service;
- in the legitimate interests of determining the success of our marketing campaigns;
- to send you marketing about products and services we think may be of interest to you;  
and
- in the legitimate interests of detecting or preventing any breach of our Terms of Service.

**Information about your device:** We collect information about the computer, tablet, smartphone or other electronic device you use to connect to our Service. This information can include details about the type of device, unique device identifying numbers, operating systems, browsers and applications connected to our Service through the device, your Internet service provider or mobile network, your IP address and your device's telephone number (if it has one).

Typically, the information we collect about how you use or connect to our Service is associated with your device and not you as a named individual. However, if you are logged into a registered account you have with us this information may also be associated with you directly.

We use information about your device in order to optimise the presentation and functioning of our Service to you on your device and in the legitimate interests of ensuring that banned users are not able to access the Service by creating a new account.

**Information about your location:** Where you give us consent, we will collect and use information about your location, sometimes together with other personal information, to provide features of the Service that are relevant to you and your location. For example, this can include allowing you to search for items that are for sale in your local area. If you change your mind about allowing us to use information about your location in the future, you can update your preferences in your device settings.

**Information provided by other users:** Sometimes, other users of our Service provide information that is associated with you. Other users can provide information that is associated with you such as comments, feedback and likes relating to your items and messages they send to you. Other users may also share information relating to an item they have bought from you on the Service on other social media channels which link to the Service, but this will not result in any information that was not already public, being made public. Where users of our Service want to invite you to use our Service or to share information with you about our services we will use personal information that they provide about you to assist them in doing this; we will only do this where they indicate that you have provided your consent for them to communicate with you in this way.

**Information about fraudulent or criminal activity relating to your account:** We will use information about fraudulent or criminal activity relating to your use of our Service for the legitimate interests of detecting and preventing fraud or crime and to comply with our legal obligations. We may monitor, including by means of AI, the information you provide to detect potential fraud or breach of Terms of Service.

**All personal information:** We will use all the personal information we collect to monitor and improve our Service, App and Site and our procedures and processes. We also use the personal information we collect to help us develop new products and services. Our use of your personal information in this way will not result in information that was not previously publicly available being made public on our Service. We also use personal information we maintain about you to resolve disputes between users, to provide user support, to troubleshoot problems and enforce our Terms of Service and policies, including this Privacy Policy.

We shall not request from you any personal information, which is deemed sensitive data, including without limitation, information regarding religious or other beliefs, physical and mental health details, sexual life, racial or ethnic origin, trade union membership and/or offences, and we ask users of the Service not to supply us or any other user with any sensitive personal information, given the nature of the Service and that user profiles and comments are visible by other users. Where you do provide sensitive personal information to us on the Service you hereby confirm that you are deliberately making this information public of your own volition and accept that we may request that you remove such data from the Service.

### **Your marketing preferences**

**Email** - From time to time we may contact you by email with information about our products and services.

If you do not want us to contact you by email, you can change your email marketing preferences by emailing us at [support@Dwisi.com](mailto:support@Dwisi.com) and letting us know that you do not want to receive marketing emails from us. You can also unsubscribe from our marketing emails by clicking on the unsubscribe link in the emails we send to you.

**Push notifications** – where you allow us to in your operating system settings, we will send you notifications relating to the Service.

You can change your push notification preferences at any time in your account settings.

Where you have given us permission to do so, we may share your information with selected third parties so that they can provide you with information about their products and services using email.

If, after you have given us permission to share your email address with selected third parties, you change your mind, you can change your email marketing preferences by emailing us at [support@Dwisi.com](mailto:support@Dwisi.com) and letting us know that you do not want us to share your email address with third parties for marketing purposes.

### **Advertising on the Service and third party websites**

We or our advertising partners may show advertisements to you on the Service or on other websites.

To do this we or our advertising partners may collect information about how you use the Service or the types of other web pages, content and ads you, or others who are using the device you connect to this Service, interact with, visit or view. The information collected might also include the IP address of the device you connect to the Service.

Such data may be exchanged between us and our advertising partners to measure the success of advertising campaigns

We or our advertising partner use the information that is collected to make sure adverts you see either on the Service or other websites or apps (where our partner has advertising space) are more relevant to you.

The techniques our advertising partners use do not use obvious identifying information such as name, address, email address or telephone number. This information is used to recognise the device you are using but not to identify you as a named individual.

Typically cookies and similar technologies are used to provide this type of advertising. You can find out more about cookies and how to manage their use by reading our [Cookie Policy](#).

You can also find out more about this type of advertising from [www.youronlinechoices.com](http://www.youronlinechoices.com).

### **Information available to other users through the Service**

The Service is designed to help you interact with other users of the Service. As a result of this some of the information generated through the Service is shared with other users of the Service as described below.

#### **1. User profile**

When you create an account on the Service a user profile will be generated for you that makes the following information publicly available: user name, country and city location, your followers and who you are following, details about the items you are selling. If you add any of the following information to your profile this will also be made publicly available: profile picture, profile description and website address. We will not directly reveal user email addresses to other users, however we may pass your email address to a seller where you have purchased an item.

#### **2. Item listings**

When you list an item for sale on the Service information you add to the listing will be made publicly available such as the item photograph, price, item description, accepted payment method and delivery options. Any comments or likes other users add to your item listing will also be made publicly available as well as any reply comments or images you post. Other users may also share a link to an item they have bought from you via the Service on other social media channels which link to the Service, but this will not result in any information that was not already public, being made public.

#### **3. Information about your activity on the Service**

Some of your activities on the Services are public by default. These activities are when you follow a user, or a user follows you, when you comment on or like an item, when you list an item for sale, when your item is sold, or when you purchase an item.

#### **4. Social networks you connect to the Service**

Where you have chosen to do so we will post updates about your use of the Service to social networks you connect to the Service on your behalf.

### **Information we share with third parties**

We may share your personal information with the following parties:

- Companies in the same group of companies as us – our subsidiaries (i.e. any organisation we own or control) or our ultimate holding company (i.e. any organisation that owns or controls us) and any subsidiaries it owns. These companies will only use your personal information in the same way as we can under this Privacy Policy.
- Service providers – third parties who provide a service to us. These third parties will only be allowed to use your personal information in accordance with our instructions and will be required to keep your information secure. In particular, we may share the personal information you provide to us with shipping providers (where you have chosen to use their services in relation to any items you sell), identity verification service providers (in order to verify your access to the Service and prevent fraudulent activity on your account), moderators who monitor our Service (to ensure our Terms of Service are being adhered to that no criminal activity is taking place using our Service), third party payment providers (for the purposes of processing any sales transactions you have consented to) and Site or Service analytics providers. In some cases, our service providers may collect information directly from you (e.g. if they are asked to conduct a survey for us), and in these cases you will be notified of the involvement of the service provider, and all information disclosures you make will be strictly optional. If you provide additional information to a service provider directly, then their use of your information is governed by their applicable privacy policy.
- Law enforcement, regulators and other parties for legal reasons – third parties who we are under a legal obligation to disclose your personal information to or who we need to disclose your personal information to protect our rights, property or safety or the rights, property or safety of others, detect and investigate illegal activities and breaches of any agreement we have with you.
- Buyers of our business – buyers of Dwisi Limited or any of its assets may have your personal information disclosed or transferred to them as part of the sale.

We will not sell or rent your personal information to a third party for marketing or other purposes without your consent. For further information on your marketing options see the [“Your marketing preferences”](#) section above.

Although the Dwisi API is publicly available, we do not permit third parties to use this for any purpose at present. The Dwisi API handles your personal data in exactly the same way as the Service.

## Information that cannot identify you

We do not disclose information about identifiable individuals to anyone else except as set out in this Privacy Policy and subject to applicable data protection legislation. We may provide third parties with aggregate statistical information and analytics about users of the Service but we will make sure that no one can be identified from this information before we disclose it.

## Storing and transferring your personal information

- **Timeframe** – We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. If you have an account with us your Personal Information will be kept by us for as long as your account remains active. If you deactivate your account, or we deactivate it due to a prolonged period of inactivity on your part, your personal information will be kept for a reasonable period of time after this so that we can complete any activities already initiated or where we have a need to retain your personal information for legal or technical reasons (including back-up systems) for example to retain proof of transactions for the enforcement of our rights, and to enable the other party to a transaction to access records of past purchases or sales. Following this period we will either delete the information or change it to a form that does not identify you. For details of retention periods for other aspects of your personal information please contact us at [data@Dwisi.com](mailto:data@Dwisi.com).
- **Cookies and local storage** – we may store information (which may include personal information) locally on your device using cookies and other browser and application storage methods. For further information please see our **Cookies Policy**.
- **Transfers outside of your country of residence** – the personal information we collect may be transferred to and stored in countries outside of the EEA including to our affiliates and our third party Service moderators. It may also be processed by staff (who work for us or for one of our suppliers) and other users of the Service operating outside the EEA, in order to fulfil a purchase, process payment details and provide support and verification services. Some of these jurisdictions offer differing levels of protection in respect of personal information and may, in certain instances, be less protective than the UK. However the transfer of your data to other countries in line with this Privacy Policy, shall only be to countries in respect of which an adequacy decision has been issued by the European Commission, or where the entity is bound an appropriate confidentiality and data transfer agreement as deemed adequate by the European Commission (details of which we are happy to share with you on request as per the “[Contacting Us](#)” section below). Where we use providers based in

the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal information shared between Europe and the US. If we collect your personal information in Australia, it may also be transferred to and stored in countries outside Australia including to our affiliates and our third party service providers who are located in countries including the UK, USA, and India. We will take all reasonable steps to ensure that your personal information is treated securely and in accordance with this Privacy Policy and any relevant privacy laws. By submitting your personal information, you agree to this transfer, storing or processing. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted through our Service; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## Your Rights

**Right to access your information:** You are entitled to see the information held about you and to check that we are lawfully processing it, and we shall comply with our obligations under applicable data protection legislation in relation to any request by you. We may charge you a reasonable fee or refuse to comply with your request if it is clearly unfounded, repetitive or excessive. We try to respond to all legitimate requests within one month (once we have been able to verify your identity). Occasionally it may take us longer than this if your request is particularly complex or you have made a number of requests.

**Right to request correction of your information:** You may ask us to make any necessary changes to ensure that the data we hold about you is accurate and kept up to date. Please keep us informed if your personal information changes during your relationship with us.

**Right to request erasure of your information:** In certain circumstances you may also ask us to erase personal information relating to you. We may not always be able to comply with your request for specific legal reasons which will be notified to you, if applicable, at the time of your request. You can exercise your right to delete certain personal information about you by closing your account with us, although we may need to keep some information about you in accordance with the "[Storing and transferring your personal information](#)" section above.

**Right to object to processing:** You may object to use processing your personal information where we are relying on a legitimate interest where you believe it impacts on your fundamental rights and freedoms. We will consider any such objection, however in some cases we may demonstrate that our legitimate grounds override your rights and freedoms. You may also object to us processing your personal information for direct marketing purposes (see "[Your Marketing Preferences](#)" above for further information about how to do this).

**Right to restriction of processing:** You may ask us to suspend the processing of your personal information in the following scenarios: (a) if you want us to establish the data's

accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where 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; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Right to request the transfer of your information:** You have the right to request a transfer of certain of your personal information to you or a third party of your choice, which we will provide in a structured, commonly used, machine-readable format.

**Right to withdraw consent:** Where we are relying on your consent to process your personal information you may withdraw this consent at any time (which you can do by changing the settings in your mobile device in relation to location data or by changing the privacy settings on your social networks in relation to information we collect from those networks).

**Right to opt-out of behavioural analytics:** If you do not want us to conduct behavioural analytics for the purposes of Dwisi's internal algorithm used to display relevant sellers and items to you or to display your items to the most relevant potential buyers, you must close your Dwisi account and cease using our Service. This is because it is essential to Dwisi to suggest the right items and sellers to you and to display your items to the right buyers which we can only do by learning about your tastes and preferences and the types of products you list.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "[Contacting us](#)" section below. We may need to request specific information from you when you exercise your rights to confirm your identity and to speed up our response. We may not be able to fulfil your request if we are not able to identify you.

Most of the personal information we hold about you is either available directly from viewing your account and looking back over your own activities or is available from the social networks that you have connected to our Service. If you think that there is other personal information which you think we hold, please contact us using the contact details set out in the "[Contacting us](#)" section below. Please provide as much information as you can about the personal information you are looking for and we will be happy to try and help you find it.

### **Links to third party sites**

The Service may, from time to time, contain links to and from third party websites of our partner networks, advertisers, partner merchants, retailers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. Please check the individual policies before you submit any information to those websites.

### **Our policy towards children**

Dwisi is a General Audience Site and our Service is only available to persons aged 13 and over.

The Service is not directed to persons under 13 and we do not knowingly collect personal information from children under 13. Children under 13 years of age are prohibited from providing

any personal information to the Site. If you become aware that your child has provided us with personal information without your consent, then please contact us using the details below so that we can take steps to remove such information and terminate the child's account.

### **Do Not Track**

We currently do not honour browser-based Do-Not-Track signals.

### **Changes to this policy**

We may amend this Privacy Policy from time to time in order that it accurately reflects the regulatory environment and our own data collection and disclosure practices. Accordingly you should review this policy periodically. When we change this Privacy Policy in a material way, we will update the "last modified" date at the top of this Privacy Policy. Changes to this Privacy Policy are effective when they are posted on this page.

### **Notice to you**

If we need to provide you with information about something, whether for legal, marketing or other business related purposes, we will select what we believe is the best way to get in contact with you. We will usually do this through email, or by placing a notice on the Service. The fact that we may send notices to you will not stop you from being able to opt out of certain types of contact as described in this Privacy Policy.

### **Contacting us**

Questions, comments and requests regarding this Privacy Policy are welcome and should be addressed to [data@Dwisi.com](mailto:data@Dwisi.com) or to our Data Protection Officer (whose contact details are stated at the beginning of this Privacy Policy).

### **Complaints**

In the event that you have a complaint about our treatment of your personal information, you have the right to lodge a complaint with the supervisory body, the Information Commissioner - [ico.org.uk](http://ico.org.uk). Details of how to do this are set out in the "for the public" section. However Dwisi welcomes the opportunity to resolve any complaint and we would suggest you first refer your complaint to our Data Protection Officer (whose contact details are stated at the beginning of this Privacy Policy), prior to making a complaint to the Information Commissioner.