

In this privacy statement:

**Services** means any products, services, content, features, technologies, or functions, and all related websites, applications and services offered to you by us.

**Platform** means the websites, mobile apps, mobile sites or other online properties through which we offer our Services.

## 1. Who are we?

The principal controller of your data for purposes of our international services is ASANSAZ Global B.V., a limited liability. ASANSAZ Global B.V is the parent company of the ASANSAZ group entities that are providing the services to you according to our Terms of Use, (hereinafter collectively referred to as “**ASANSAZ**”, “**we**”, “**us**” or “**our**” in this privacy statement). These ASANSAZ group entities are also considered data controllers for the local services they offer. Relevant contact details are set out in section 13.

## 2. What data do we collect about you?

- *Data provided through direct interactions*

### Registration and other account information

When you register to use our Services, we may collect the following information about you:

- if you register using your Google account: first name, last name and email address;
- if you register using your Facebook account: we collect first name and last name as appeared on your Facebook account and Facebook IDs. In the event you have provided permission to Facebook through their in-app privacy option (which appears just before you register on our Platform), we may collect your gender, age or email id depending on the permissions granted by you; and
- if you register using your mobile number: mobile number.

Depending on the choices you make during the log-in to our Services or during the process of engaging our Services, you may opt to give the following additional personal data:

- your name;
- e-mail address;
- mobile number; and/or
- your credit card details in case you want to purchase our paid services as defined in our **Terms of Use**.

### Communication through the chat feature on our Platform

When you use our chat feature to communicate with other users, we collect information that you choose to provide to other users through this feature.

- ***Data we collect automatically when you use our Services***

When you interact with our Platform or use our Services, we automatically collect the following information about you:

#### **Device Information**

- We collect device-specific information such as operating system version and unique identifiers. For example, the name of the mobile network that you are using. We associate the device identifiers with your ASANSAZ account.

#### **Location information**

- Depending on your device permissions, if you post an item on our Platform, we automatically collect and process information about your actual location. We use various technologies to determine location, including IP address, GPS, Wi-Fi access points and mobile towers. Your location data allows you to see user items near you and helps you in posting items within your location.

#### **Client and Log data**

- Technical details, including the Internet Protocol (IP) address of your device, time zone and operating system. We will also store your login information (registration date, date of last password change, date of last successful login), type and version of your browser.

#### **Clickstream data**

- We collect information about your activity on our Platform which includes the sites from which you accessed our Platform, date and time stamp of each visit, searches you have performed, listings or advertisement banners you clicked, your interaction with such advertisements or listings, duration of your visit and the order in which you visit the content on our Platform.

#### **Cookies and Similar Technologies**

- We use cookies to manage our users' sessions, to store your preferences language selection and deliver you relevant advertisements. "**Cookies**" are small text files transferred by a web server to the hard drive of your device. Cookies may be used to collect the date and time of your visit, your browsing history, your preferences, and your username. You can set your browser to refuse all or some cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Services/Platform may become inaccessible or not function properly. For more information on the cookies we use, please see our [\*\*Policy on Cookies and Similar Technologies\*\*](#), the terms of which are incorporated into, and form part of this Privacy Policy by reference.
- ***Data from third parties or publicly available sources.***

We may receive personal data about you from various third parties and public sources. If you would like more information about this, please contact us using the relevant contact details set out in section 13.

### 3. Do we collect data from children?

Our Services are not intended for children under 16 and we do not knowingly collect data from anyone under 16. If we become aware that a person under 16 has provided us with personal data, we will delete it immediately.

If you are resident in Pakistan and under 21, we are not permitted to contract with you directly. If you are a resident in Pakistan and under 21 then, by agreeing to this Privacy Policy, you acknowledge and agree that your guardian has read and consented to its terms on your behalf. If we seek your consent to process your personal data for a specific purpose in accordance with this Privacy Policy, consent must be granted on your behalf by your guardian.

### 4. Why do we process your personal information?

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

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests to improve our Services and to provide you a safe and secure Platform.
- Where we need to comply with a legal or regulatory obligation.

In certain circumstances, we may also process your personal data based on your consent. If we do this, we will let you know the purpose and the category of personal data to be processed at the time we seek your consent.

We have set out below a description of the ways we use your personal data.

- **For providing access and delivering Services through our Platform**
- If you log in using your mobile number or email id, we use your first name and last name, mobile number and/or e-mail address to identify you as a user and provide access to our Platform.
- If you log in using your Facebook account, we use your first name and last name from your Facebook profile and the Facebook e-mail address to identify you as a user on our Platform and to provide you access to our Platform.

The above log-information data is also used by us to deliver our Services to you in accordance with our Terms of Use.

We use your e-mail address and mobile number (by SMS) to make suggestions and recommendations to you about our Services that may be of interest to you.

We process the above information for adequate performance of our contract with you and on the basis of our legitimate interest in undertaking marketing activities to offer you Services that may be of your interest.

- **For improving your experience on the Platform**

We use clickstream data to:

- offer you tailored content, such as giving you more relevant search results when using our Services;
- to determine how much time, you spend on our Platform and in what manner you navigate through our Platform in order to understand your interests and to improve our Services based on this data. For example, we may provide you with suggestions on content that you can visit based on the contents you have clicked; and
- to monitor and report the effectiveness of the campaign delivery to our business partners and for internal business analysis.

We use your location data for the following purposes:

- to compile anonymous and aggregated information about the characteristics and behavior of ASANSAZ users, including for the purposes of business analysis, segmentation and development of anonymous profiles;
- to enhance the performance of our Services and to personalize the content we direct towards you. For example - with the help of location data we display ad listings which are in your vicinity to improve your buying experience; and
- to measure and monitor your interaction with the third-party advertisements banners we place on our Platform.

With the help of your log-in information which includes your email id and phone number, we map the different devices (such as desktop, mobile, tablets) used by you to access our Platform. This allows us to associate your activity on our Platform across devices and helps us in providing you a seamless experience no matter which device you use.

We process the above information on the basis of our legitimate interest to improve your experience on our Platform and for adequate performance of our contract with you.

- **To provide you with a safe and secure Platform**

1. We use your mobile number, log data and unique device identifiers to administer and protect our Platform (including troubleshooting, data analysis, testing, fraud prevention, system maintenance, support, reporting and hosting of data).
2. We analyze your communications done through our chat feature for fraud prevention and to promote safety by blocking spam or abusive messages that may have been sent to you by any other user.

We process the above information for adequate performance of our contract with you, to improve our services and on the basis of our legitimate interest to prevent fraud.

## 5. How will we inform you about changes in our privacy statement?

We may amend this privacy statement from time to time. We will post changes on this page and will let you know by e-mail or through our Platform. If you or your guardian (as the case may be) do not agree with the changes, you may close your account by going to account setting and select delete account.

## 6. Your rights

You may have certain legal rights regarding your personal data depending on the country you are in or how we interact with you. You can learn more about this in this section.

### 6.1. Pakistani data subjects

If you are a data subject in Pakistan, you will have the following rights:

- **Right to request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Right to request correction** of any of the data we have 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.
- **Right to withdraw your consent to the processing of your personal data at any time.** This does not affect the legality of any processing we have already carried out based on the consent given previously.

### 6.2. EU General Data Protection Regulation ("GDPR") data subjects

If you are a data subject under the GDPR, you will have certain additional rights in relation to our handling of your personal information.

- **Right to request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Right to request correction** of any of the data we have 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.
- **Right to withdraw your consent** to the processing of your personal data at any time. This does not affect the legality of any processing we have already carried out based on the consent given previously.
- **Right to request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful; (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 erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal 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 your personal data to comply with local law. Please note that for certain purposes we may be legally obligated to retain your data. Please see section 10.
- **Right to object** to the processing of your personal 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 on your fundamental rights and freedoms. You also have the right to object where we are processing your personal 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.
- **Right to request for the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- To lodge a complaint at any time with your local supervisory responsible for you as outlined in section 13. However, before you make a complaint to the data protection authority, we would appreciate the chance to deal with your concerns in the first instance, please reach out to our Privacy Officer at [privacy@Asansaz.com](mailto:privacy@Asansaz.com).

**No fee usually required:** You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

**Time limit to respond:** We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

## 7. Communication and marketing

We will communicate with you by email, SMS or in app notification in connection with our Services/Platform to confirm your registration, to inform you in case your ad listing has become live/expired and for other transactional messages in relation to our Services. As it is imperative for us to provide you such transactional messages you may not be able to opt-out of such messages.

However, you can ask us to stop sending you marketing communication at any time by clicking on the opt-out link in the email or SMS sent to you or by reaching out us on [Privacy@Asansaz.com](mailto:Privacy@Asansaz.com).

You may receive marketing communications from us if you:

- have requested such information from us;
- use our Platform or Services;
- provided us with your details when you entered a competition; or
- registered for a promotion.

## 8. Who do we share your data with?

We may have to share your personal data with the parties set out below for the purposes set out in section 4 above.

**Corporate affiliates** – we may share your data with other ASANSAZ group companies which are located within as well as outside European Economic Area (“**EEA**”) and Pakistan and help us in providing business operation services such as product enhancements, customer support and fraud detection mechanism. Where the GDPR applies to personal data then any sharing of personal data within the ASANSAZ group of companies situated outside the **EEA** will always be subject safeguards as described in section 9 or to a data transfer agreement which clearly defines the obligations of the parties and ensures appropriate technical and organizational measures to protect your data.

**Third Party Service Providers:** We use third party service providers to help us deliver certain aspect of our Services for example, cloud storage facilities such as Amazon Web Services and Microsoft Azure. Service providers may be located inside or outside of the **EEA** and Pakistan.

We conduct checks on our third-party service providers and require them to respect the security of your personal data and to treat it in accordance with the law. We do not allow them to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

**Advertising and analytics providers:** In order to improve our Services, we will sometimes share your non-identifiable information with analytics providers that help us analyze how people are using our Platform/Service. We share your information with them in non-identifiable form for monitoring and reporting the effectiveness of the campaign delivery to our business partners and for internal business analysis. For further details about our advertisers and analytics provider please refer to our **Policy for Cookies and similar Technologies**.

**Law enforcement authorities, regulators and others:** We may disclose your personal data to law enforcement authorities, regulators, governmental or public bodies and other relevant third parties to comply with any legal or regulatory requirements.

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 your personal data in the same way as set out in this privacy statement.

**Publicly available information:** When you post an item for sale using our Services, you may choose to make certain personal information visible to other ASANSAZ users. This may include your first name, last name, your email address, your location and your contact number. Please note, any information you provide to other users can always be shared by them with others so please exercise discretion in this respect.

## 9. Where do we store your data and for how long?

The data we collect about you may be stored and processed inside as well as outside the EEA and Pakistan in secure servers in order to provide the best possible user experience. For example – for fast website or mobile application build up.

We will only retain your personal data for as long as necessary to fulfill 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 unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In case you have any queries in relation to the retention period of your data please contact us at [privacy@Asansaz.com](mailto:privacy@Asansaz.com).

## **10. Technical and organizational measures and processing security**

All the information we receive about you are stored on secure servers and we have implemented technical and organizational measures that are suitable and necessary to protect your personal data. ASANSAZ continually evaluates the security of its network and adequacy of its internal information security program which is designed to (a) help secure your data against accidental or unlawful loss, access or disclosure, (b) identify reasonably foreseeable risks to the security of the ASANSAZ network, and (c) minimize security risks, including through risk assessment and regular testing. In addition, we ensure that all payment data are encrypted using SSL technology.

Please note, despite the measures we have implemented to protect your data, the transfer of data through the Internet or other open networks is never completely secure and there is a risk that your personal data may be accessed by unauthorized third parties.

## **11. Links to third-party websites**

Our Platform may contain links to third party websites or apps. If you click on one of these links, please note that each one will have its own privacy policy. We do not control these websites/apps and are not responsible for those policies. When you leave our Platform, we encourage you to read the privacy notice of every website you visit.

## **12. Contact**

For any additional information or to exercise your rights, please contact our Privacy Officer at [privacy@asansaz.com](mailto:privacy@asansaz.com), or go to the Help Section in our Platform.

## **13. Changes to this Policy**

We may amend this Privacy Policy from time to time to keep it up to date with legal requirements and the way we operate our business. Please regularly check this page for the latest version of this Privacy

Policy. If we make material changes to this Privacy Policy, we will seek to inform you by notice on our website or application, or email ("**Notice of Change**").

Your continued use of our Services following an amendment or Notice of Change indicates your or your guardian's acceptance (as the case may be) of any changes.