

## **Privacy Policy**

### **PROFIT WELLNESS FOOD RESTAURANT L.L.C**

Privacy Policy is effective from 15 January 2026 and remains in force as of the present date.

#### **1. Scope and Applicability**

This Privacy Policy applies to all personal data processed by PROFIT WELLNESS FOOD RESTAURANT L.L.C. in the course of operating this website and conducting its business activities. The Policy governs the processing of personal data regardless of the method by which such data is collected, including data collected through online forms, email correspondence, telephone communications, written documents, in-person interactions, or through third parties acting on behalf of the Company in accordance with applicable law.

The scope of this Policy extends to all categories of data subjects whose personal data may be processed by the Company. This includes, without limitation, website visitors, customers, prospective customers, suppliers, contractors, business partners, employees, former employees, job applicants, and any other individuals who interact with the Company in a commercial, contractual, or professional capacity.

This Privacy Policy applies equally to personal data collected prior to its publication and to data collected thereafter, to the extent permitted by applicable law. Where personal data was collected under previous privacy terms, such data shall continue to be processed in a manner consistent with the principles set out herein.

By accessing this website, submitting personal data, or otherwise engaging with the Company, data subjects acknowledge that they have read, understood, and accepted the terms of this Privacy Policy. If a data subject does not agree with the provisions of this Policy, they should refrain from using the website or providing personal data to the Company.

#### **2. Legal Grounds for Processing Personal Data**

The Company processes personal data strictly in accordance with the requirements of applicable legislation of the United Arab Emirates, including Federal Decree-Law No. (45) of 2021 Concerning the Protection of Personal Data. Personal data is processed only where a valid and lawful basis exists, and the Company does not engage in arbitrary or excessive processing.

Personal data may be processed on the basis of the explicit consent of the data subject, where such consent has been freely given, is specific, informed, and unambiguous. Where processing is based on consent, the data subject retains the right to withdraw such consent at any time. Withdrawal of consent shall not affect the lawfulness of processing carried out prior to the withdrawal.

Processing may also be carried out where it is necessary for the performance of a contract to which the data subject is a party, or for taking steps at the request of the data subject prior to

entering into such a contract. This includes, for example, processing required to provide services, manage reservations or orders, process payments, or fulfill contractual obligations.

In addition, the Company may process personal data where such processing is required to comply with a legal obligation imposed under UAE law, including obligations relating to taxation, accounting, employment, regulatory compliance, or lawful requests from competent authorities. Personal data may also be processed where necessary to protect the vital interests of the data subject or another individual, or where processing is required for the legitimate interests of the Company, provided that such interests do not override the fundamental rights and freedoms of the data subject.

### 3. Categories of Personal Data Processed

The Company processes various categories of personal data depending on the nature of the relationship with the data subject and the purposes for which the data is collected. The categories of personal data processed are limited to what is necessary, relevant, and proportionate to achieve legitimate business and legal objectives.

Personal data may include identification and personal details, such as a data subject's full name, date of birth, nationality, and other information required to identify the individual and manage the relationship with the Company. This information is typically collected when a data subject makes an inquiry, places an order, enters into a contractual relationship, or otherwise interacts with the Company.

The Company may also process contact information, including residential or business addresses, email addresses, telephone numbers, and other communication details. Such data is used to communicate with data subjects, provide services, respond to inquiries, and deliver relevant information relating to the Company's activities.

Where applicable, the Company may process financial and transactional data, including bank account details, payment card information, billing records, invoices, transaction histories, and payment confirmations. This data is processed solely for lawful purposes such as processing payments, issuing refunds, maintaining accounting records, and complying with financial and regulatory obligations.

In addition, the Company may collect and process technical and usage data, such as IP addresses, browser types, device identifiers, operating systems, and information about how data subjects interact with the website. This information is used to ensure website functionality, improve user experience, monitor security, and analyze performance.

The Company may further process communication data, including emails, messages, feedback, complaints, and other correspondence exchanged with the Company. Where relevant, employment-related data may also be processed, such as CVs, educational qualifications, work experience, and other information necessary for recruitment and human resources management.

The categories of personal data processed by the Company are not limited to those described above and may be expanded where permitted by law and required for legitimate purposes.

#### 4. Purposes of Processing Personal Data

The Company processes personal data exclusively for specific, explicit, and lawful purposes that are directly related to its business activities and obligations. Personal data is not processed in a manner that is incompatible with the purposes for which it was originally collected, unless such processing is permitted or required by applicable law.

One of the primary purposes of processing personal data is to operate, manage, and improve the Company's website and services. This includes enabling users to access website functionalities, submit inquiries, place orders or reservations, and communicate with the Company. Personal data is also processed to ensure the technical stability and security of the website and to monitor and prevent fraudulent or unauthorized activity.

Personal data is further processed for the purpose of providing products and services to customers. This includes managing customer relationships, processing orders and payments, issuing invoices and receipts, handling refunds, and providing customer support. Processing in this context is necessary to fulfill contractual obligations and to respond effectively to customer requests and inquiries.

The Company also processes personal data for administrative, operational, and internal management purposes, including accounting, auditing, financial reporting, record keeping, and business analysis. In addition, personal data may be processed for human resources purposes, such as recruitment, onboarding, personnel administration, training, performance management, and compliance with employment-related obligations.

Personal data may also be processed to comply with legal and regulatory requirements applicable in the United Arab Emirates. This includes responding to lawful requests from governmental or regulatory authorities, complying with court orders, and fulfilling obligations under tax, labor, and commercial legislation.

Where permitted by law and subject to applicable consent requirements, the Company may process personal data for marketing and promotional purposes, including sending information about products, services, special offers, or events that may be of interest to data subjects. Data subjects retain the right to opt out of such communications at any time.

#### 5. Data Accuracy and Responsibility of Data Subjects

The Company takes reasonable and appropriate measures to ensure that the personal data it processes is accurate, complete, and kept up to date, taking into account the purposes for which such data is processed. Accuracy of personal data is important to ensure that services are provided correctly, legal obligations are fulfilled, and the rights and interests of data subjects are protected.

While the Company implements internal procedures to maintain data accuracy, data subjects also bear responsibility for ensuring that the personal data they provide is truthful, complete, and current. Data subjects are encouraged to promptly notify the Company of any changes to their personal data, such as changes in contact details or other relevant information, to allow the Company to update its records accordingly.

Where the Company becomes aware that personal data is inaccurate, outdated, or incomplete, it will take reasonable steps to correct, update, or supplement such data without undue delay. In certain circumstances, the Company may be required to retain historical or original data for legal, regulatory, or evidentiary purposes, even where updated information has been provided. In such cases, appropriate measures will be taken to ensure that the retained data is not used in a manner that is misleading or inappropriate.

Data subjects have the right to request the correction of inaccurate or incomplete personal data in accordance with applicable law. Such requests will be assessed and handled within a reasonable timeframe and in compliance with legal requirements.

## 6. Data Retention and Storage

The Company retains personal data only for as long as is necessary to fulfill the purposes for which such data was collected and processed, including the satisfaction of contractual, legal, regulatory, accounting, or reporting requirements. Retention periods are determined based on the nature of the personal data, the purpose of processing, and applicable legal obligations under the laws of the United Arab Emirates.

Personal data may be retained for longer periods where such retention is required to establish, exercise, or defend legal claims, to resolve disputes, or to comply with requests from competent authorities. In all cases, retention is limited to what is strictly necessary and proportionate.

Personal data is stored in a manner that ensures its confidentiality and security, whether in electronic systems or physical records. The Company implements appropriate safeguards to prevent unauthorized access, loss, misuse, alteration, or disclosure of personal data during the retention period.

Once personal data is no longer required for the purposes for which it was collected and no legal basis for continued retention exists, the Company will securely delete, anonymize, or otherwise render such data inaccessible, in accordance with applicable laws and internal data retention policies.

## 7. Disclosure and Sharing of Personal Data

The Company may disclose or share personal data strictly on a need-to-know basis and only to the extent necessary to achieve the purposes described in this Privacy Policy. Any disclosure of personal data is carried out in compliance with applicable UAE laws and subject to appropriate safeguards to ensure confidentiality and security.

Personal data may be shared internally within the Company with authorized employees or departments whose responsibilities require access to such data. Access is limited to personnel who have received appropriate training and are bound by confidentiality obligations.

The Company may also disclose personal data to third-party service providers, contractors, or professional advisers who support the Company's operations. These may include, without limitation, IT service providers, payment processors, accounting firms, auditors, legal advisers, marketing service providers, and logistics or delivery partners. Such third parties are engaged under contractual arrangements that require them to process personal data solely in accordance with the Company's instructions and to implement appropriate technical and organizational measures to protect such data.

In certain circumstances, personal data may be disclosed to governmental, regulatory, judicial, or law enforcement authorities where such disclosure is required by law, regulation, court order, or other legally binding request. The Company may also disclose personal data where necessary to protect its legal rights, enforce contractual obligations, or defend against legal claims.

The Company does not sell personal data to third parties and does not disclose personal data for purposes unrelated to those described in this Privacy Policy without a lawful basis.

## 8. Cross Border Transfers of Personal Data

In the course of its business operations, the Company may transfer personal data outside the United Arab Emirates where such transfer is necessary for legitimate operational, contractual, or administrative purposes. This may include, for example, the use of cloud-based services, engagement of international service providers, or communications with counterparties located outside the UAE.

Where personal data is transferred internationally, the Company ensures that such transfers are carried out in compliance with applicable UAE data protection legislation. Transfers will only take place where the recipient jurisdiction provides an adequate level of protection for personal data, or where appropriate safeguards have been implemented to ensure the confidentiality, integrity, and lawful processing of such data.

Such safeguards may include contractual arrangements imposing data protection obligations on the recipient, technical security measures, or other legally recognized mechanisms. In circumstances where personal data is transferred without the consent of the data subject, such transfer shall be limited to cases expressly permitted under applicable law, including where the transfer is necessary to fulfill contractual obligations, protect vital interests, or comply with legal requirements.

The Company continuously assesses cross-border data transfer practices to ensure ongoing compliance with legal standards and to minimize risks associated with international data processing.

## 9. Rights of Data Subjects

The Company respects and upholds the rights of data subjects as provided under applicable UAE data protection legislation. Data subjects have the right to obtain confirmation as to whether their personal data is being processed and, where applicable, to access such personal data in a clear and comprehensible form.

Data subjects may request the correction or updating of personal data where such data is inaccurate, incomplete, or outdated. Where processing is based on consent, data subjects have the right to withdraw their consent at any time, without affecting the lawfulness of processing carried out prior to the withdrawal.

In certain circumstances, data subjects may request the restriction of processing, the cessation of processing, or the deletion of personal data, where such requests are permitted under applicable law. The Company will assess such requests carefully and respond within a reasonable timeframe, taking into account legal obligations that may require continued processing or retention of certain data.

Data subjects also have the right to object to processing in cases where processing is carried out in violation of the stated purposes or applicable legal requirements. In addition, data subjects may lodge a complaint with the competent authority in the United Arab Emirates if they believe that their personal data has been processed unlawfully or in breach of their rights.

The exercise of data subject rights may be subject to identity verification and certain legal limitations. The Company reserves the right to refuse or limit requests where permitted by law, including where compliance would adversely affect the rights of others or conflict with legal obligations.

## 10. Security Measures

The Company places significant importance on the security and protection of personal data and implements appropriate technical, organizational, and administrative measures designed to safeguard personal data against unauthorized or unlawful access, loss, destruction, alteration, disclosure, or misuse.

Such measures include, where appropriate, access controls, password protection, encryption, secure storage systems, internal policies and procedures, and staff training aimed at ensuring awareness of data protection obligations. Access to personal data is restricted to authorized personnel only, based on their role and responsibilities, and is granted strictly on a need-to-know basis.

The Company regularly reviews and updates its security practices to take into account technological developments, emerging risks, and changes in applicable legal requirements. While the Company takes all reasonable steps to protect personal data, no system can be guaranteed to be completely secure, and the Company cannot warrant absolute security of personal data transmitted or stored electronically.

In the event of a personal data breach that poses a risk to the rights or interests of data subjects, the Company will take appropriate steps to mitigate the impact of such breach and, where required by law, notify the competent authorities and affected data subjects in a timely manner.

## 11. Amendments to This Privacy Policy

The Company reserves the right to amend, update, or modify this Privacy Policy at any time in order to reflect changes in legal requirements, regulatory guidance, business practices, or operational needs.

Any amendments to this Privacy Policy will be published on the Company's website and will become effective upon publication, unless a different effective date is expressly stated. Data subjects are encouraged to review this Privacy Policy periodically to remain informed about how their personal data is processed.

Continued use of the website or continued interaction with the Company following the publication of an updated Privacy Policy constitutes acceptance of such changes, to the extent permitted by applicable law.

## 12. Contact Us

If you have any questions, concerns, requests, or complaints regarding this Privacy Policy or the processing of your personal data, you may contact the Company using the details below:

[profitfoodby@gmail.com](mailto:profitfoodby@gmail.com)

The Company will make reasonable efforts to review and respond to all legitimate inquiries in a timely manner and in accordance with applicable laws of the United Arab Emirates.