

Introduction

Welcome to VENU 's Data Policy.

VENU respects your privacy and is committed to protecting your personal data. This Data Policy will inform you as to how we look after your personal data when you visit our application/website and tell you about your privacy rights and how the law protects your personal data.

1. Important information and who we are.

1.1 Purpose of this Data Policy

This Data Policy aims to give you information on how VENU collects and processes your personal data through your use of the website or the mobile application, including but not limited to any data you may provide through this application/website when you [sign up to our newsletter, register and/or purchase a product or service, as well as installing and signing up to our mobile application].

This application/website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Data Policy together along with our Terms and Conditions [<https://www.venuegypt.com/privacy-policy>] when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Data Policy supplements other notices and privacy policies and is not intended to override them.

1.2 Controller

VENU is the controller and responsible for your personal data (referred to as ["VENU"], "we", "us" or "our" in this Data Policy). VENU is the controller and responsible for this application and website only and is not responsible to any third-party links that may be available on VENU' application or website and may ask for your personal data

If you have any questions about this Data Policy or our privacy practices, please note that you can contact us through the following ways:

Email address: contact@venuapps.com

Telephone number: +2 01225900046

Address: 25 Youssef Abbas, Nasr City, Cairo, Egypt.

1.3 Changes to the Data Policy and your duty to inform us of changes

We keep our Data Policy under regular review. VENU may at any time amend or change this data policy unilaterally. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

1.4 Third-party links

This Platform may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party applications/websites and are not responsible for their privacy statements. When you leave our application/website, we encourage you to read the Data Policy of every application/website you visit.

2. Personal Data that we collect

Your personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which is including but not limited to the following:

- a. Identity data includes [first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender].
- b. Contact data includes [billing address, delivery address, email address and telephone numbers].
- c. Technical data includes [internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website].
- d. Profile data includes [your username and password, purchases or orders made by you, your interests, preferences, and feedback and survey responses].
- e. Usage data includes [information about how you use our website, products and services]

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences

3. If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services requested from us). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time

4. How is your personal data collected?

We use different methods to collect data from and about you including:

4.1 Direct interactions. You may give us your Identity, contact and financial data by filling in forms or by corresponding with us by post, phone, and email or otherwise. This includes personal data you provide when you undertake the following:

- a. Using our services;
- b. create an account on our website;
- c. subscribe to our service or publications;
- d. request marketing to be sent to you;
- e. Filling a survey;
- f. give us feedback or contact us

4.2 Automated technologies or interactions. As you interact with our application/website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other mobile applications/websites employing our cookies.

5. How we use your personal data

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 (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

- Where we need to set up your account and administrate it.
- Where we need to deliver marketing and events communication.
- Where we need to carry out surveys.
- Where we need to personalize content, user experience or business information.
- Where we need to meet audit requirements internally.

Where you have given consent.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

6- Purposes for which we will use your personal data

A) Performance of a contract with you

We process your personal data because it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract or agreement.

In this respect, we use your personal data for the following:

- Subject to your consent, independent third parties whom we engage to assist in delivering the services to you;
- Our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, IT or public relations advisers;
- Debt collection agencies where it is necessary to recover money you owe us;
- Our data storage providers

The legal basis for the processing of the aforementioned data categories is Art. 6 (1) (a) of the European General Data Protection Regulation (GDPR). Due to the said purposes, in particular to guarantee security and a smooth connection setup, we have a legitimate interest to process this data. And without the contrary to all the relevant Egyptian applicable laws, public policy or public moral in the Arab Republic of Egypt.

B) Legitimate interests

We also process your personal data because it is necessary for our legitimate interests,

In this respect, we use your personal data for:

For the administration and management of our business, including recovering money you owe to us, and archiving or statistical analysis;

Seeking advice on our rights and obligations, such as where we require our own legal advice. In this respect we will share your personal data with our advisers or agents where it is necessary for us to obtain their advice or assistance and with third parties and their advisers where those third parties are acquiring, or considering acquiring, all or part of our business.

C) Legal obligations

We also process your personal data for our compliance with a legal obligation which we are under. In this respect, we will use your personal data for the following:

- To meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws;
- As required by tax authorities or any competent court or legal authority. In this respect, we will share your personal data with the following:
 - Our advisers where it is necessary for us to obtain their advice or assistance;
 - Our auditors where it is necessary as part of their auditing functions;
 - With third parties who assist us in conducting background checks;
 - With relevant regulators or law enforcement agencies where we are required to do so.

D) Marketing

We will send you marketing (announcement!) about services we provide which may be of interest to you, as well as other information in the form of alerts, newsletters, discounts, promotions or functions which we believe might be of interest to you or in order to update you with information (such as legal or commercial news) which we believe may be relevant to you and to our services. We will communicate this to you in a number of ways including by post, telephone, email or other digital channels.

E) Promotional offers

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (Marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us [or if you provided us with your details when you entered a competition or registered for a promotion] and, in each case, you have not opted out of receiving that marketing

F) Third-party marketing

- i. We will get your express opt-in consent before we share your personal data with any company outside VENU for marketing purposes.
- ii. You can ask us to stop sending you marketing messages at any time by logging into the application/website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

G) Cookies

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

H) Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

I) Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the application/website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time and please note that the process might take some time if you contacted us via mail.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

7. Disclosures of your personal data

We may share your personal data with the parties set out in article (6) purposes for which we will only use your personal data above.

Third parties to whom 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 Data Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers 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.

8. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, third party service providers and other parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so

9. Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

When it is no longer necessary to retain your personal data, we will delete it.

[Details of retention periods for different aspects of your personal data are [available in our retention policy which you can request from us by contacting us.

10. What we do if the information is incorrect?

We do perform checks on the information that we receive to detect any defects or mistakes. However, we are reliant upon suppliers, namely Companies House, providing accurate information to us. You have the right to request that we:

Rectify any personal data relating to you that is inaccurate; and

Complete any incomplete data, including by way of a supplementing, corrective statement. This is known as the right to rectification. If you do exercise your right to rectification, we will take steps to check the information and correct it where necessary.

11. How do we deal with the “right to be forgotten”?

You have the right to request the erasure of personal data that we hold about you in certain circumstances, for example if it were not acquired for, or has ceased to be necessary for, a lawful purpose. This is known as the right to be forgotten. Where you request that we erase your data, we will usually only do so where the data has ceased to be publicly available, or where we no longer use it

THIRD PARTIES

Internal Third Parties

Other companies than VENU acting as joint controllers or processors who are based in Egypt and provide IT and system administration services and undertake leadership reporting.

External Third Parties

Service providers acting as processors based in Egypt who provide IT and system administration services.

Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

Governmental bodies and other authorities acting as processors or joint controllers based in the Arab Republic of Egypt who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the 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.

Request correction of the personal data that we hold 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.

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. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to 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

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:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- 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.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request 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.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide our services to you. We will advise you if this is the case at the time you withdraw your consent.

Contact Us

If you have any questions about how we use your personal data, or you wish to exercise any of the rights set out above, please contact our controller listed under 1.2 of this Data Policy.