

PRIVACY POLICY

OSKELLY TRADING LLC PRIVACY POLICY

Oskelly Trading LLC ("**Oskelly**") is a Limited Liability Company based in Dubai, UAE (Commercial Register Number 1732711, Tax Registration Number 100488469600003, located at Office: DUBAI COMMERCITY LLC of PO Box 491, Dubai, United Arab Emirates, BCB2-215). "**Oskelly**" also means its Branch (General Trading License Number 50262 located at Premises No BCB2 215, Second Floor, Business Cluster – Building 2, Dubai Airport Freezone). Oskelly provides database and software services to parties who have an interest in an exciting and safe online shopping experience and an elevated level of personal service synonymous with Oskelly. This commitment includes respecting and protecting the privacy of the personal information of its users.

Our policies have been developed with the recognition that Internet technologies and underlying business models are rapidly evolving. Accordingly, our policies are subject to change. Any such changes will be posted on this page. If the changes represent a material departure from our current practices with respect to the use of personal information, the changes will be posted on this page thirty (30) calendar days prior to taking effect, and registered users will be notified as appropriate.

As a condition of using oskelly.co (the "**Site**"), users must confirm their adult status. In alignment with the Children's Online Privacy Protection Act (COPPA), Oskelly does not collect or store any personal information, even in aggregate, about children under the age of 13.

EU DATA SUBJECTS (USERS)

The General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union, effective May 25, 2018. It also addresses the export of personal data outside the EU. The GDPR replaces the 1995 Data Protection Directive. ANY EU DATA SUBJECT WISHING TO SEE HOW WE COMPLY WITH THESE REGULATIONS ARE DIRECTED TO OUR GDPR PRIVACY POLICY ADDENDUM (<https://cdn.files.oskelly.co/info/pdf/privacy-policy-GDPR.pdf>).

This privacy policy describes the types of information we collect from and about you when you visit our website (each a "**Site**") or use our mobile applications (each an "**App**"). The Sites and Apps are collectively referred to as the "**Services**". This privacy policy also explains how Oskelly may use and share your personal information, as well as your ability to control certain uses of it.

By using the Services, you agree to the collection, use, and disclosure of your information as described in this privacy policy, including the transfer to and storage of your personal information, and agree to the Terms of Use which are incorporated by reference. If you do not agree, please do not access or use the Services.

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- 1) INFORMATION WE COLLECT AND HOW WE COLLECT IT**

SUMMARY

To provide the Services and first-class shopping experience, we collect information from and about you. That information may include the following categories of information:

1. **Contact Information and Other Personal Identifiers:** This may include your name, email address(es), postal address(es), social media usernames, and telephone number(s), including your mobile number(s).
2. **Payment Information:** If you make purchases or make sales via the Services, we may collect your credit card number, expiration date, CVV code, and billing address but do not store your credit card number.
3. **Commercial Information:** We collect your order and payment history.
4. **Browsing and Device Information:** We may collect your IP address or another device identifier, the kind of browser you use, browsing information such as the pages and content that you visit, data analytics and other information regarding your interaction with the Services or our advertisements or location information from your device.
5. **Demographic Information:** We may collect demographic information like your age, gender, and income.
6. **Other Information:** We may collect additional information including information you submit via chat or online forms, completing surveys, or participating in sweepstakes.

Oskelly may collect information from or about you in a number of ways. Please note that if you decline to provide any of the requested information (whether or not required), you may not be able to take full advantage of the Services and their features or make a purchase from us.

From Oskelly's Interactions With You: We collect information from and about you and your transactions and other interactions with us. This may include when you use the Services, create an online account with us, make a purchase, sign up for our catalog, newsletters or email lists, participate in sweepstakes, contests or other promotions, participate in a product review, survey, or other similar programs, send a gift or virtual gift card to a person, or otherwise contact us. The personal information we collect may include Personal Identifiers and Contact Information such as your name, address, email address, telephone number, or other contact information, loyalty program membership information, Demographic Information such as gender, birthday, and age, as well as your interests and preferences.

If you make a purchase from us, we may also collect Payment and Commercial Information such as a

credit or debit card number or other financial information, CVV, and billing address.

If you download one of our Apps, it may be possible for the App to obtain your precise geolocation. If so, you may choose to permit the App to obtain such information. In this case, we will determine your zip code from the precise location data received from your mobile device. We do not store precise location data; we only store the zip code associated with the location.

Information You Provide About a Third Party: If you send someone else a communication from the Services (such as sending a gift or virtual gift card), we may collect information such as that person's name, telephone number, email, and/or shipping address.

Automatically on the Site or App: We, or our service providers, may use cookies, web beacons/pixel tags, log files, JavaScript, and other technologies to collect Browsing and Device Information – certain non-personal information about visitors to our Site or App, users of our online services, and interactions with our emails and online advertisements, and to allow Oskelly to keep track of analytics and certain statistical information. For example, we may collect information such as your browser type, operating system type or mobile device model, viewed webpages, links that are clicked, IP address mobile device identifier or other unique identifier, sites or apps visited before coming to our Site or App, the amount of time you spend viewing or using the Site or App, the number of times you return, or other click-stream or site usage data, emails we send that you open, forward, or click through to our Site or App. If you sign up for our text messaging program, cookies may be used to personalize your experience (e.g. send you personalized text messages such as shopping cart reminders).

Collecting this information, and linking it with your personal information, helps us to tailor our Site or App and enhance your online shopping experience by saving your preferences while you are visiting a particular site, and to help identify Site or App features, promotions, advertisements, and offers that may be of particular interest to you and retarget online and mobile advertisements to you across computers or devices you may use.

From Third-Party Sources: We may acquire information from other sources to update or supplement the information that you provide or that we collect automatically (such as information to validate or update your address or other Demographic Information), or when you connect with the company through a third party (including through social networks) based on your registration and privacy settings on those third-party sites.

Combination of Information: We may combine the information we receive from or about you, including information you provide to us and information we automatically collect through the Site or App, as well as information across other computers or devices that you use, with information we collect or receive about you from other online and offline sources, or from other third party sources.

Third-Party Analytics and Advertisements: We also may use third-party advertisements, analytics, and tracking tools to better understand who is using the Site or App, how people are using the Site or App, how to improve the effectiveness of the Services and related content, and to help us or those third parties serve more targeted advertising to you across the Internet. These third parties may use technology such as cookies, web beacons, pixel tags, log files, flash cookies, or other technologies to collect and store non-personal information. They may also combine information they collect from your interaction

with the Site or App with the information they collect from other sources. We do not have access to, or control over, these third parties' use of cookies or other tracking technologies.

Tracking Options?

Certain parts of the Site and App require cookies. By registering for and using the Services, you are consenting to the use of cookies. Because of the members-only nature of our Services, cookies are essential to the function of our websites and the provision of the Services. If you do not agree to the use of cookies, you cannot use the Services. The following is a description of the four categories of cookies and examples of how we use them to provide you the Services:

- Strictly Necessary Cookies – These cookies are essential to enable you to browse and use the functionality of a website and without them, the Services cannot be provided. We use these cookies, among other things, to recognize and maintain your logged-in status throughout your visit and manage your shopping cart.
- Performance Cookies – These cookies collect information about how visitors use the Services, for example, pages that they visit and if they receive error messages. This information does not identify you individually and is used in the aggregate to improve our Services.
- Functionality Cookies – These cookies allow us to remember certain choices you make about how you like to use the Services and provide you a more personalized experience, for example, your shipping country and currency preferences.
- Targeting Cookies – These cookies are used to deliver online advertisements that are relevant to you and your interests and to measure the effectiveness of advertising campaigns. They may be placed on the Services by us or by our advertising partners with our permission. For more on targeting cookies and your ability to control their use, please see below.

Our system may not respond to Do Not Track requests or headers from some or all browsers. We may use cookies or other technologies to deliver more relevant advertising and to link data collected across other computers or devices that you may use.

A Note on Cookies

A "cookie" is a small amount of data that is sent to your browser from a web server and is sometimes stored on your computer's hard drive, although not always. Our site uses cookies primarily for features available only to logged in users, but also for things like remembering that we've shown you a particular message and not to show it again. For logged in users, our cookies contain unique numbers that allow our site to recognize your computer as you move about our site during a session or period of use. These cookies are necessary for our site to work properly. For example, cookies allow us to remember that you are logged in when you move from between pages on the site.

The help function on most browsers contains information on how to set your browser to notify you before accepting cookies or to disable cookies entirely. However, if you don't accept cookies, you won't be able to use any feature that requires registration or subscription.

Oskelly, along with third-party vendors, such as Google and DoubleClick, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to

inform, optimize, and serve ads based on past visits to our website.

To opt-out of receiving advertising like this from Google, you can manage these settings by visiting the Google Ads Preferences Manager.

For more information on our cookie use and policy see our full Cookie Policy (Annex 1).

2) HOW YOUR INFORMATION WILL BE USED

Oskelly may collect information from or about you in a number of ways. Please note that if you decline to provide any of the requested information (whether or not required), you may not be able to take full advantage of the Services and their features or make a purchase from us.

From Oskelly's interactions with You: We collect information from and about you and your transactions and other interactions with us. This may include when you use the Services, create an online account with us, make a purchase, sign up for our catalog, newsletters or email list, participate in sweepstakes, contests or other promotions, participate in a product review, survey, or similar programs, send a gift or virtual gift card to a person, or otherwise contact us. The personal information we collect may include Personal Identifiers and Contact Information such as your name, address, email address, telephone number, or other contact information, loyalty program membership information, Demographic Information Oskelly uses personally identifiable information in a limited number of ways, in general falling into the following categories:

Usage Tracking for Business Development and Management

Our primary business is conducted entirely online. As such, our success will depend on our ability to gauge popularity of one feature or product offering over another, or on our ability to understand how people use our products. Tracking and aggregating usage information will allow us to develop this understanding.

Our Communications Features

Our site offers registered users the ability to forward along objects of interest to others. In order to facilitate this communication, a registered user's email of record must be accessed.

Communications with Our Customers, Customer Support, and Promotional E-mail

From time to time, it may be necessary to notify subscribers of impending subscription expirations, account or credit card issues, transactions completed, and in the case of registered users terms agreement or policy changes. While such communication will typically be conducted through email, as appropriate, mail or phone may also be used. We may also use your personal information to send you e-mail newsletters and other promotional emails about services and products that we believe may be of interest to you.

Oskelly may use the information we collect from and about you for any of the following purposes:

- Contact Information and Personal Identifiers, and Payment and Commercial Information:
 - To validate, confirm, verify, deliver, install, and track your order (including to process payment card transactions, arrange for shipping, handle returns and refunds, maintain a record of the purchases

you make, and contact you about your orders, including by telephone) or to service products you purchased from us.

- To send you catalogs, information, newsletters, promotional materials, and other offerings from Oskelly or, where permitted by applicable law, on behalf of our partners and affiliates.
- To contact you when necessary or requested, including responding to your questions and comments and providing customer support.
- **Browsing Information and Data Analytics:**
 - To enhance your online shopping experience, including as a way to recognize you and welcome you to the Site or App.
 - To provide you with customized Site or App content, targeted offers, promotions and advertising on the Site or App, through other third party sites or apps, or via email, text messages, or App push notifications that are offered by Oskelly or other marketing partners that might be of interest to you.
 - To improve our sites, products/services, customer service, and customer shopping experience.
 - To use your data in an aggregated non-specific format for analytical and demographic purposes.
 - To protect the security or integrity of the Site and our business, such as by protecting against and preventing fraud, unauthorized transactions, claims and other liabilities, and managing risk exposure, including by identifying potential hackers and other unauthorized users.
- **Other Data:**
 - As otherwise described to you at the point of data collection.

The information that Oskelly may share with others

Oskelly may share personal information we collect from and about you in the following ways:

Contact Information and Personal Identifiers, and Payment and Commercial Information: We use third-party service providers to perform certain services on our behalf when the information is necessary for them to perform their duties. These third-party service providers are prohibited from using personal information for any other purpose and are contractually required to comply with all applicable laws and requirements, which may include Payment Card Industry Data Security Standards if they are processing payments for Oskelly.

Certain areas of the Services may be provided to you in association with service providers and third parties, such as companies that provide products and services, rewards programs, conduct joint sales programs, sweepstakes, promotional campaigns, and other jointly sponsored events. Such Services will identify the third party. If you elect to register for any products and/or services provided during the Services, you either will be providing your information to both Oskelly and such third party, or Oskelly might share your information directly with such third party for that third party to fulfill their products and our products and services directly with you.

Other Third Parties: Where permitted by applicable law, Oskelly may share your information with select partners, affiliates, and other third parties that we believe may have offers or be of interest to you.

Legal Disclosures; Safety: Oskelly may transfer and/or disclose the information we receive from and about you to comply with a legal obligation; to provide information to law enforcement and other governmental authorities in accordance with applicable law, and when we believe in good faith that the law requires it. We also reserve the right to share information with legal authorities and other companies for fraud protection and credit risk reduction, to detect any technical or security vulnerabilities, to enforce our Terms of Use or other applicable policies, or to otherwise protect the rights, property, safety, or security of third parties, users of the Services, Oskelly, or the public.

Sale of Business: During the normal course of our business, we may sell or purchase assets. If another entity acquires all or a part of Oskelly Trading LLC or its affiliated companies, all or a portion of the information we have collected about you may be transferred to such entity. In addition, if any bankruptcy or reorganization proceeding is brought by or against Oskelly Trading LLC or its affiliated companies, such information may be considered an asset of such company and may be sold or transferred to third parties. Should a sale or transfer occur, we will use reasonable efforts to try to require that the transferee use personally identifiable information provided through the Services in a manner that is consistent with this Privacy Policy.

Aggregate or Anonymous Non-Personal Information: We may also share or sell non-identifiable aggregate or anonymous information with our affiliates, agents, service providers, business partners, or other third parties for their marketing or analytics uses or for other lawful purposes. This type of non-identifiable and aggregate information cannot be used to identify you personally.

Compelled disclosure

Note: Oskelly may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements

Sharing Your Personally Identifiable Information

In some instances, we use third party companies to help us provide our products and services to you, like a shipping company that delivers a package or an e-mail delivery service that sends out our e-mails or e-newsletters. In those instances we need to share your information with them. We require that those companies use the information only to deliver our product or service.

Oskelly will share some or all of your personal information with another business entity should we plan to merge with or be acquired by that business entity. In the event that such a combination occurs, we will require that the new combined entity follow this privacy policy with respect to your personal information. If your personal information will be used contrary to this policy, you will receive prior notice in as provided above.

General Data Protection Regulations (GDPR)

Effective May 25, 2018 EU Data Subjects, or Users will have new rights relative to Information one of which is greater awareness of our use of data from Users. While our use of data for all global users is

the same, and described above and in in our GDPR policy amendment, the actions and rights of objection and arbitration are as set for by prevailing local laws. Please see the GDPR amendment for more information specified in the manner compliant with the EU GDPR (<https://cdn.files.oskelly.co/info/pdf/privacy-policy-GDPR.pdf>).

3) HOW YOU CAN VIEW/CORRECT/UPDATE OR REMOVE INFORMATION

Except for tracking and aggregated information, or as outlined in the section 5) below on Security and Protection of Your Information, all your information is available to you for review and update through your secure My Oskelly page. Effective May 25, 2018, our handling of information related to EU Data Subjects is regulated by the GDPR, our observance of which is outlined in our GDPR addendum.

If you have registered for an account or made a purchase, you may view and update your account information by logging into the "Your Account" section of the Site or App with your email address and password. Once logged in, you can view or update your name, address, telephone number or email address. You can also contact our Customer Service Department via email at info@oskelly.co to access or update any of this information.

4) OUR E-MAIL POLICIES; YOUR CHOICES ABOUT RECEIVING COMMUNICATIONS FROM OSKELLY

If you register for an account or make a purchase, you will automatically receive promotional emails and direct mail from Oskelly. We provide our customers with the opportunity to "opt-out" of having their information used for purposes not directly related to placement, processing, fulfillment or delivery of product order. We provide you with the following options if you prefer to "opt-out" of receiving information or materials that we think may be of interest to you:

Electronic Promotional Offers: At all times, you have the option of "opting out" of receiving promotional emails from the sender only by clicking the "unsubscribe" link in any of the promotional emails you receive. In addition, if you have an online account, you may change your email preferences regarding email from us by logging into the "Your Account" section of the Site or App.

Direct Mail Promotional Offers: If you would like to be removed from our Oskelly catalog mailing list, please contact a Customer Service representative by email to stop receiving paper catalogs.

Push Notifications: When you use the App, you may receive push notifications. If you prefer not to receive push notifications, you may adjust your settings on your mobile device to control whether you want to receive these alerts.

App Geolocation Information: When you use the App on your mobile device, you may choose not to share your geolocation information with us by adjusting the device's location service settings.

Other Contact: In all cases, you may email us at info@oskelly.co.

Account and Services Related E-mail

We will send you e-mails relating to your account. These include order confirmations, renewal/expiration notices, and credit card problem notifications.

eMail Newsletters

We may offer eMail newsletters. If you do not wish to receive newsletters, you can either (1) follow the 'unsubscribe' instructions located near the bottom of each newsletter, or (2) log in and go to My Oskelly, select "opt out" in your Personal Information area and then select "Update Personal Information".

Promotional eMails

We may eMail you messages that we think may be of interest to you about other products and services. You can choose not to receive additional future messages by either (1) following the 'unsubscribe' instructions located near the bottom of each e-mail, or (2) log in and go to My Oskelly, select "opt out" in your Personal Information area and then select "Update Personal Information."

5) SECURITY AND PROTECTION OF YOUR INFORMATION; PROTECTING CHILDREN'S PRIVACY

We take very seriously our commitment to protect your personal information. To this end, we maintain a secure process to collect, transmit and store your personally identifiable information including credit card details.

We have taken certain physical, administrative, and technical steps to safeguard the information we collect from and about our customers and Site visitors. While we make every effort to help ensure the integrity and security of our network and systems, we cannot guarantee our security measures. When you enter sensitive information (such as credit card information) on our forms, we encrypt the transmission of that information using secure socket layer technology (SSL).

We urge you to keep your password in a safe place and not to divulge it to anyone. Also remember to sign off your account and close your browser window when you have finished your visit. This ensures that others cannot access your account, especially if you are sharing a computer with someone else or using a computer in a public place.

As a dynamic and growing Site, Oskelly may contain links to other sites that are not under our control. Those Web sites have their own policies regarding privacy. For your own protection, you should review their policies upon visiting these other sites to make sure they meet your expectations of privacy.

Protecting children's privacy is important to us, and the Site and App are not intended for children under the age of thirteen. We do not direct the Site or App to, nor do we knowingly collect any personal information from, such children. If you are not 18 or older, you are not authorized to use the Services. If Oskelly learns that a child under the age of thirteen has provided personally identifiable information to the Site or App, it will use reasonable efforts to remove such information from its files. Parents should be aware that there are parental control tools available online that you can use to prevent your children from submitting information online without parental permission or from accessing material that is harmful to minors.

6) HOW TO CONTACT US

If you feel that we have not followed our privacy policy, or if you have any questions or concerns about the Oskelly Privacy Policy or its implementation, please contact us by email at: privacy@oskelly.co, or by mail at:

Oskelly Trading, LLC

Attention: Privacy Officer

DUBAI COMMERCITY LLC of PO Box 491, Dubai, United Arab Emirates, BCB2-215

Any changes to our Privacy Policy will be posted here so that you will always know what information we gather, how we might use that information, and whether we may disclose it to anyone. Your continued use of the Site or App following the posting of changes to these terms will mean you accept these changes.

We welcome you to reach out if you have any questions or concerns regarding our privacy practices. Please feel free to contact Customer Service via email at info@oskelly.co. We are transparent about the ways in which we collect and use personal information and welcome your questions and concerns. If you have any concerns or complaints about the way we handle your personal information, please contact us at privacy@oskelly.co. To the extent you believe we have not addressed your concerns or otherwise choose to do so, you have the right to lodge a complaint with a supervisory authority in the country where you reside.

For all questions about unsubscribing, contact info@oskelly.co.

For privacy-related questions, contact privacy@oskelly.co.

This policy document 2.0 was last revised effective 11.04.2023.

COOKIE POLICY

This Cookie Policy explains how cookies, sessions, and similar technologies (together “cookies”) are used by Oskelly Trading LLC (“we” or “our”). By using our website oskelly.co you agree to the use of cookies as outlined in this Cookie Policy. Please disable cookies on your computer or do not use our website if you do not wish to accept cookies from us.

What cookies are

Cookies are small data files which are placed on your device when you visit certain parts of our website or click on our online advertisements. We use one or more of the following cookies:

Strictly necessary cookies are required for the operation of our website by allowing our web server to determine whether the cookies setting on your web browser have been enabled or disabled. This allows us to know whether data can be collected from your web browser temporarily allowing you to carry information between pages of our website to avoid having to re-enter that information temporarily identifying your device after you have logged in to a secure page on our website so that our web server can maintain a dialogue with your web browser in order for you to carry out certain activities.

Analytical/performance cookies are used to help us improve our website by tracking your visits to our website and recognising your web browser when you are a repeat visitor so that we can gather statistics on new and repeat visitors to evaluate site effectiveness.

Functionality cookies are used to recognise you when you return to our website. This enables us to:

- Remember the choices you make (such as your user name, language and region) so you do not have to re-enter that information when you return to our website
- Personalise our website content for you

Targeting/advertising cookies record your visit to our website, your response to our online advertisements, track the pages you have visited and the website links you have followed. We use this information to:

- Make our website more relevant to your interests based on your past visits to our website
- Tailor our online advertisements or offers on our or third party websites to those which are most likely to be of interest to you
- Evaluate the effectiveness of our online marketing and advertising campaigns

The above cookies may be placed on your device by us or by third parties on our behalf.

Fraud prevention

We may also use the above mentioned cookies to assist us in fraud prevention.

Google Analytics

This website uses Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses cookies (text files placed on your computer) to help the website operators analyse

how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

How to disable cookies

Most web browsers are initially set up to accept cookies. You can choose not to accept cookies by changing the settings on your web browser but if you block all cookies, including strictly necessary cookies, you may find that certain features on our website will not work properly. You can choose not to accept third party cookies through your browser settings.

Updates

We may amend our Cookie Policy from time to time to keep it up to date with legal requirements and the way we operate our website. If we decide to change our Cookie Policy, we will place any updates on our website, such as this webpage. Please regularly check this webpage and the Cookie Policy of any relevant Platforms for the latest version of our Cookie Policy.

Governing Law

This Cookie Policy is governed by and will be construed in accordance with the laws of the Emirate of Abu Dhabi and the federal laws of the United Arab Emirates as applicable in the Emirate of Abu Dhabi.

This policy document 2.0 was last revised effective 11.04.2023.