

Personal Data Processing and Cookies Policy

Terms and their definitions

1. Policy –
this policy on the processing of personal data and cookies, located on the Internet at:
<https://dda-realestate.com/docs/privacy-policy-en.pdf>.
2. We, Us, Ours, etc., as well as the Operator – TRN:
104741067300003 D D A REAL ESTATE L.L.C Office No,4,, Abdullah Ahmed Abdullah Al Mousa - Al
Sufouh 2, Dubai, Dubai, 28282, Dubai
license: 1084263
3. You, Yours, Yours, etc., as well as the Subject of personal data – our
counterparty under the User Agreement, which may be an individual who
uses the Site, in the manner and under the conditions established by the
Agreement.
4. User Agreement –
an offer regulating the procedure for using the Site by
Users, and located at the link: [User Agreement](#).
5. Personal data – any information that relates to an identified or identifiable
natural person. An identifiable person is one who can be identified
directly or indirectly, in particular by reference to identifiers such as a
name, an identification number, location data, an online identifier, or to
one or more factors specific to the physical, physiological, genetic,
mental, economic, cultural or social identity of that natural person.
6. Personal data processing – any action (operation) or set of actions
(operations) performed with or without the use of automation tools with
personal data, including collection, recording, systematization,
accumulation, storage, clarification (updating, modification), extraction,
use, transfer (distribution, provision, access), depersonalization, blocking,
deletion, destruction of personal data. Personal data is processed using a
mixed (including automated) processing method.
7. Automated processing of personal data is the processing of personal data
using computer technology.
8. Confidentiality of personal data is a mandatory requirement for Us or any
other person who has gained access to Personal data to prevent their
dissemination without the consent of the Subject of Personal Data or
other legal grounds.
9. Depersonalization of personal data – actions as a result of which it
becomes impossible to determine the belonging of personal data to a
specific subject of personal data without the use of additional
information.
10. Site – Our website <https://dda-realestate.com>.
11. Cookies are small text files placed by the Site on your computer or device
when you, for example, visit certain sections of the Site and/or when you
use certain functions of the Site.
12. Federal Law No. 152-FZ - Federal Law of the Russian Federation dated
July 27, 2006 No. 152-FZ "On Personal Data"
- .
13. GDPR or Regulation – General Data Protection Regulation (EU)

2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of their Personal Data and on the free movement of such data, and repealing Directive 95/46/EC and any amendments, modifications and supplements thereto, as may be applied from time to time and incorporated into the national legislation of the Member States.

14. California Online Privacy Protection Act or CalOPPA - California Online Privacy Protection Act.

15. The California Consumer Privacy Act or CCPA is the first comprehensive privacy law in the United States, passed in late June 2018, and provides a variety of privacy rights to California consumers.

16. US Privacy Act 1974 or UPA – A privacy protection law that regulates the processing of personal information of US citizens or individuals with permanent residence in the United States.

17. PECR - Privacy and Electronic Communications (EC Directive) Regulations 2003;

18. UAE Data Protection and Privacy Laws – any and all laws and regulations governing the Processing of Personal Data, including but not limited to: (1) the Dubai Data Protection and Privacy Law, (2) the Federal Data Protection Law (Law No. 45 of 2021), which came into force on 2 January 2022, (3) the Constitution of the United Arab Emirates (UAE),(Federal Law No. 1 of 1971); (4) the Crimes and Punishments Law (Federal Law No. 31 of 2021, repealing Federal Law No. 3 of 1987); (5) The Cybercrime Law (Federal Law No. 5 of 2012 on Combating Information Technology Crimes) (as amended by Federal Law No. 12 of 2016 and Federal Decree Law No. 2 of 2018); (6) The Communications Regulation Law (Federal Law under Decree 3 of 2003, as amended), including regulations/policies issued by the Telecommunications and Digital Regulatory Authority (TDRA) regarding the protection of telecommunications consumer data in the UAE.

Subject and grounds for processing personal data

1. Subject of the Policy. The provisions of this Policy shall apply to the relations between Us and You related to the Processing of personal data within the framework of the relations arising between Us regarding the use of the Site, which are formed as a result of your acceptance of the terms of the User Agreement.

2. Grounds for processing. The basis for processing your personal data is always your consent. Without consent to the terms of this Policy, we will not be able to fully ensure the fulfillment of obligations under the agreements concluded with you (including, but not limited to, the User Agreement).

Acceptance of the terms of the Policy

1. In this section, you can learn about the actions, the performance of which means your consent to the Processing of your personal data (hereinafter referred to as "Consent to the Processing of PD").

2. Contents of the Consent to the processing of PDn. By providing Consent

to the processing of PDn, you confirm that you have fully read and agree with [User Agreement](#), [Personal data and cookie processing policy](#), and provide specific, objective, informed, conscious and unambiguous [Consent to the processing of your personal data](#).

3. Please note that Consent to the processing of PD means that you, among other things, express your consent to the Automated, as well as non-Automated, Processing of your Personal Data, on the terms specified in the Policy, as well as in the Consent to the processing of personal data.

4. Order a call back. If you order a call back by using the relevant functionality of the Site, you are considered to have provided Consent to the processing of PDn at the moment of clicking on the "Order a call" button (or similar).

5. Making an outgoing call. By making a call to the Operator and continuing the conversation with the Operator's employee, you provide Consent to the processing of PDn.

6. Messaging via messenger. If you send a message to Us via messenger, including using the relevant functionality of the Site, then your Consent to the processing of PDn is considered to be provided at the moment of sending the first message to Us.

7. Familiarization with the content of the Site. If you simply browse the Site, you are considered to be providing Us with Consent to process PDn, to the extent specified in this Policy (technical data, Cookies (unless another consent procedure regarding the processing of Cookies is implemented on the Site)).

8. Storage of consent information. Please note that we may store data on your actions (by means of a system for logging your actions, or similar) confirming your Consent to the PD, as specified in this section of the Policy, for 3 (Three) years after your consent to the Policy, unless another period is provided by law.

Term of policy and processing of personal data

1. Validity period of the Policy. After accepting the terms of the Policy, the Policy is valid indefinitely. However, this does not affect the period of Processing of your personal data - it is established by this Policy.

2. Personal data processing period. As a general rule, We process your Personal data until We contact You regarding Your request, as well as for 3 (Three) years after the said event, unless the storage period for personal data is established by applicable law, the User Agreement, or another agreement in one way or another related to the use of the Site or the Processing of Your Personal data, to which You are a party. In other cases, We will stop processing Your Personal data if You object to such processing or if You have revoked Your previously given consent to processing, in accordance with the terms of this Policy and the provisions of the law. However, in this case, We may be unable to fulfill obligations under agreements with You.

3. Change. The Policy may be changed by Us at any time. This may be due to changes in Our business processes, the influence of external factors and other reasons. After making changes, we will immediately publish the amended Policy on the Site so that you have the opportunity to study

it in the new version. If you continue to use the Site after changes have been made to the Policy, we will certainly consider that you agree with the terms of the Policy in the new version.

Reasons for development, objectives, principles of the Policy

1. Reasons for development. The policy has been developed in compliance with the requirements of: a) GDPR; b) CalOPPA; c) CCPA; d) PECR; e) Federal Law No. 152-FZ; f) GDPR; g) UAE Laws on Data Protection and Privacy, h) as well as other laws and regulations that determine the cases and features of processing the personal data of the Personal Data Subject.

2. Objectives. The Policy pursues the following objectives: (1) ensuring the requirements for the protection of human and civil rights and freedoms when processing personal data, including the protection of the rights to privacy, personal and family secrets, (2) eliminating unauthorized actions (illegal or accidental access) of any third parties to your Personal data, as well as the destruction, modification, blocking, copying and distribution of personal data, (3) ensuring the legal and regulatory regime of confidentiality and control of your Personal data, (4) protecting the constitutional rights of citizens to personal privacy, confidentiality of information constituting Personal data, and preventing the emergence of a possible threat to your safety.

Thus, the main purpose of the Policy is to provide you with a full and transparent understanding regarding: the legal basis for collecting and processing your Personal Data; the categories of Personal Data that we may collect about you; what happens to the Personal Data that we collect; where we process your Personal Data; how long we store your Personal Data; to whom we may transfer your Personal Data; and to explain your rights as a subject of Personal Data.

3. Principles. We adhere to the following principles of personal data processing: (1) personal data must be processed lawfully and fairly, (2) personal data must be limited to achieving specific, predetermined and legitimate purposes; personal data may not be processed in a manner that is incompatible with the purposes of collecting personal data, (3) the content and volume of personal data processed must correspond to the stated purposes of processing; the personal data processed must not be excessive in relation to the stated purposes of their processing, (4) when processing personal data, the accuracy of personal data, their sufficiency and relevance in relation to the purposes of personal data processing must be ensured, (5) personal data must be stored for no longer than required by the purposes of personal data processing, unless another period for storing personal data (or the procedure for determining it) is not provided for by the Policy.

Composition of collected Personal data

1. Order a call back. You have the opportunity to order a call back from Us.

To do this, you need to leave the following data by entering the information in a special form on our Site: (1) Subscriber mobile phone number, (2) Name. Please note that by providing third party data, you

undertake to comply with the guarantees specified in this Policy. We also ask you to take into account that you can name any Name by entering the relevant information in the form, including one that does not correspond to your own name. However, in this case, we ask you to take into account that the Name entered must meet the requirements of ethics and morality.

2. Messenger data. Our Site allows you to write to Us via What's App, Telegram, or another messenger (if available). The Site has special URL links (like <https://messenger-bot.whitewill.ru/web/...> and/or similar), and when you click on them, you will be able to send us a message via the selected messenger. When you send such a message, we will receive the address of your account in the relevant messenger, and any other data you specified in such an account will be made publicly available.

3. Technical data. When using the Site, We automatically collect some of your Personal Data. Such data includes, for example, technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, login data, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, information about your visit to websites, etc.

4. Other data. In exceptional cases, we may ask you to provide additional Personal data. We will definitely notify you of this in advance and ask you to provide additional consent to the Processing of additional Personal data.

5. Personal data of third parties. Please note that if you provide us with Personal data of third parties, you guarantee that you have received from such persons all necessary consents (including consent to the transfer of personal data), other documents required for the implementation of the provisions of this Policy in full, executed by them in the form and in accordance with their personal applicable legislation (Consent of third parties), and if you act as the operator of personal data of such persons, you also guarantee that you ensure the procedure for the transfer and protection of their personal data in an amount no less than that provided for in this Policy. In this case, the Consent of third parties must be executed by them in writing, the original of which must be provided by you no later than 7 (Seven) calendar days from the date of sending the corresponding request from the Operator. Provision of Personal data of third parties without compliance with this guarantee is unacceptable, and you fully assume all responsibility for the violation of this guarantee.

Rights of the Subject of Personal Data

1. Receiving information. You have the right to receive information about Us, Our location, whether We have Your Personal Data, and to review such Personal Data.

2. Clarification. You have the right to demand that we clarify your Personal Data, block it or destroy it if the Personal Data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, and also to take measures provided by law to protect your rights.

3. Form of provision. Information about the availability of Personal data by Us will be provided to You in an accessible form, and it will not contain Personal data related to other Subjects of Personal data.

4. Access procedure. You (or your legal representative) may access your Personal Data in person or by sending a written request. In this case, the request must contain the number of the main document certifying your identity or that of your legal representative, information about the date of issue of the said document and the issuing authority, and your own signature. The request may be sent electronically. We are obliged to respond to your request within 30 (Thirty) days from the date of its receipt, which, given the complexity and number of requests, may be extended to 60 (Sixty) days.

5. Contents of the response. In your request for access to Personal data, you have the right to demand that we provide you with information regarding the Processing of your Personal data, including: (1) confirmation of the fact of processing of Personal data, as well as the purpose of such processing, (2) methods of processing Personal data, (3) the name and location of the Operator, information about persons who have access to Personal data or who may be granted such access, (4) a list of Personal data being processed and the source of their receipt, (5) the terms of processing of Personal data, including the terms of their storage, (6) information about what legal consequences for the Subject of Personal data may entail the Processing of his Personal data.

6. Withdrawal of consent. You have the right to withdraw consent to the processing of Personal data, limit the methods and forms of processing of Personal data, prohibit the distribution of Personal data without your consent.

7. Right to appeal. You have the right to appeal our actions or inaction to the authorized body for the protection of the rights of personal data subjects or in court.

8. Right to protection. You have the right to protect your rights and legitimate interests, including compensation for damages and moral harm in court.

Rights of the Data Subject (GDPR)

If you are a citizen of a member state of the European Economic Area or the United Kingdom (or lawfully provide us with Personal Data of such a person), you are also granted the rights set out below. You can exercise them by sending an appropriate e-mail to Our Contact Details.

1. Right to be informed (Articles 12–14 of the Regulation). You have the right to be informed about the collection and use of your Personal Data, in particular about the purposes for which such Personal Data is processed, the storage periods and to whom it will be transferred. This information must be provided at the time we collect your Personal Data. If we receive Personal Data from other sources, we will inform you of this within a reasonable time after receiving the data and no later than one month, unless you already have such information and unless it would require disproportionate effort to provide it. Information must be concise, transparent, understandable, easily accessible and expressed in clear and understandable language, so we try to explain our data processing policy in detail. We will inform you of any new use of your Personal Data before we begin to process it.

2. Right of access (Article 15 of the Regulation). You have the right to

obtain from the Controller confirmation as to whether Personal Data concerning you are being processed and, where applicable, access to the Personal Data and the following information: the purposes of the processing; the categories of Personal Data concerned; the recipients or categories of recipients to whom the Personal Data have been or will be disclosed, in particular recipients located in third countries or international organisations; where possible, the envisaged period for which the Personal Data will be stored or, if not possible, the criteria used to determine that period; the existence of the right to request from the Controller rectification or erasure of Personal Data or restriction of processing of Personal Data concerning the data subject or to object to such processing; the right to lodge a complaint with a supervisory authority; the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the Regulation and, at least in those cases, meaningful information about the underlying algorithm and the significance and envisaged consequences of such processing for the data subject. If Personal data is transferred to a third country or an international organization, you have the right to receive information about the existing guarantees related to such transfer. Upon request, the Operator will also provide a copy of the Personal data being processed. For any additional copies requested by the subject of the Personal data, the Operator may charge a reasonable fee based on administrative costs. If you make a request by electronic means, and unless otherwise required, the information shall be provided in a generally accepted electronic form.

3. Right to rectification (Article 16 of the Regulation). You have the right to rectify incorrect or inaccurate information regarding Personal Data upon request for rectification, made orally or in writing. The Operator has one calendar month to respond to the request of the subject of Personal Data.

4. Right to erasure (“right to be forgotten”) (Article 17 of the Regulation)

The Regulation gives individuals the right to have personal data erased. You can request erasure by contacting our Data Protection Officer, who has one month to respond to your request. Please note that this right is not absolute and only applies in certain circumstances, as provided for in Article 17 of the Regulation.

5. Right to restriction of processing (Article 18 of the Regulation). You have the right to request that the processing of your Personal Data be restricted or ceased. Where processing has been restricted, such Personal Data, with the exception of storage, shall only be processed with the consent of the data subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for the purposes of protecting the public interest of the Union or of a Member State. Please note that this right is not absolute and only applies in certain circumstances provided for in Article 18 of the Regulation.

6. Right to data portability (Article 20 of the Regulation). The right to data portability allows you to obtain and reuse your Personal Data for your own purposes across different services. It allows you to easily move, copy or transfer Personal Data from one IT environment to another in a safe and secure manner without affecting the usability of the Personal Data. Please note that you have the right to have Personal Data transferred

directly from one Operator to another, where technically feasible.

7. Right to object (Article 21 of the Regulation). You have the right to object at any time to the processing of your personal data on grounds relating to your particular situation. We will no longer process your personal data unless we have compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. If your personal data is processed for direct marketing purposes, you have the right to object to the processing of personal data concerning you for the purposes of such marketing, including profiling to the extent that it is related to direct marketing. 8. Rights related to automated decision-making, including profiling (Article 22 of the Regulation). You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or significantly affects him or her. Please note that this right is not absolute and only applies in certain circumstances provided for in Article 22 of the Regulation. You can withdraw your consent to the processing of Personal Data at any time. Please remember that the withdrawal of consent only applies for the future. Any processing activities carried out before such withdrawal will not be affected by it.

Transfer of Personal Data

1. Transfer of Personal Data. In order to achieve the purposes of personal data processing, we may need to provide your Personal Data to our counterparties, including, but not limited to, JSC "Amotsrm", INN: 7709477879, OGRN: 5157746087681. Your Personal Data may also be transferred to government agencies, in particular, executive authorities, based on their request.

2. Mandatory and optional transfer. Transfer of information may be mandatory, for example, in terms of information about user equipment: IP address, OS, geographic data, ID/equipment type, channel used: browser/application, payment authorization, identification/verification, or optional, for example, in terms of information about address match indicators, account information, etc.

Storage of Personal Data

1. Localization of Personal Data. If you are a citizen of the Russian Federation, we store your data on servers located in the Russian Federation. If you are a citizen of one of the member states of the European Economic Area, the United Kingdom, or another country whose personal data legislation requires that Personal Data be Processed in the territory of such country, your Personal Data is collected and Processed in the territory of the European Economic Area or such country, respectively.

Principles and measures for protecting personal data

1. Principles of protection. We apply legal, organizational, administrative, technical and physical measures to protect Personal data - to ensure the

protection of your Personal data.

2. Security measures. Measures to ensure the security of Personal data during their processing are planned and implemented in order to ensure compliance with the requirements of legislation in the field of Personal data and the regulatory legal acts adopted in accordance with it. We ensure the security of your Personal Data, including in the following ways: (1) limiting and specifying the composition of the Operator's employees who have access to Personal Data, (2) appointing a person responsible for organizing the processing of Personal Data, (3) developing and implementing local acts on the processing of Personal Data, (4) identifying threats to the security of Personal Data when processing them in Personal Data information systems, (5) applying organizational and technical measures to ensure the security of Personal Data, (6) applying the information security tools that have undergone the established procedure for assessing the compliance of information security tools, (7) taking into account electronic storage media, (8) establishing rules for access to Personal Data, (9) restricting access to the premises where the technical means processing Personal Data are located and where the storage media are stored, (10) detecting facts of unauthorized access to Personal Data and taking measures to prevent such access, (11) adding Personal Data (not publicly available, requiring confidentiality) to the list of confidential information of the Operator, (12) obtaining an obligation to non-disclosure of confidential information, including Personal Data, from all employees of the Operator directly involved in the processing of Personal Data, (13) restoration of Personal Data modified or destroyed due to unauthorized access to them, (14) familiarization of the employees of the Operator directly involved in the processing of Personal Data with the provisions of the legislation on personal data, including requirements for the protection of Personal Data, local acts on issues of processing Personal Data, (15) control over the measures taken to ensure the security of Personal Data.

Cookies

1. Use of Cookies. The Site uses Cookies. When you visit the Site, your Internet browser transmits certain information to our server: (1) date and time of visit, (2) browser type, (3) language settings, (4) operating system. This information is stored in connection logs for a limited time (from a session to a year) to ensure the security and proper operation of the Site, as well as to collect statistical information.

2. Cookie functions. There are different groups of cookies that are used on the Site. The first group is functional and technical cookies. The main function of such files is to allow the Site server to receive information about your session, the language used, browser, etc., and to ensure the full functionality of the Site. These files are needed to recognize you when you visit the Site again. This allows us to personalize the content of the Site to your needs, remember your preferences. The second group is analytical cookies, they allow us to evaluate and count the number of visitors, as well as understand how they move around the Site when working with it. This helps us to improve the operation of the Site, for example, by optimizing the search for the sections you need, making it

simple and effective. You have the right to refuse the use of analytical cookies by making the appropriate settings in your web browser.

3. Cookie storage time. According to the storage time on users' devices, Cookies are divided into Persistent and Session: "Session Cookies" are files that are stored on your device until you close your browser. "Persistent Cookies" are stored on your device until their expiration date

or until you delete them.

4. Disabling Cookies. You have the ability to accept or reject all Cookies on all websites you visit by changing the settings in your web browser. For example, when using Internet Explorer version 11.0 you would do the following: (1) select "Settings"

, then "Internet Options"

, (2) click on the

"Privacy" tab, (3) use your mouse to select your preferred settings. Each browser requires its own settings to change and delete Cookies. Please note that certain functionality of the Site may not be available if Cookies are disabled. For more information on how to adjust or change your browser settings, please refer to your browser instructions or visit

www.aboutcookies.org or www.allaboutcookies.org If you use different devices to access the Site (e.g. smartphone, tablet, computer, etc.), you should ensure that each browser on each device is configured according to your preferences regarding Cookies.

Addresses for exchanging legally significant messages

1. Details of the Parties. In the course of fulfilling obligations under this Policy and/or other obligations, as the Personal Data Operator, there may be (and in some cases must be) an exchange of legally significant messages between Us. Such exchange takes place through the official contacts of the Parties, both in writing and in electronic form (equivalently). In this case, the conclusion of a separate agreement on the use of electronic document management is not required. Our data is specified in the Official Notice (at the bottom of the document), and your data is specified by you at the time of leaving a request for a call back, by sending us a message in a messenger or through other communication channels. Please remember that you bear all the risks associated with the fact that your data for the exchange of legally significant messages has become irrelevant. 2. Exchange of correspondence. Exchange of correspondence is possible only with the use of the data of the Parties, determined in accordance with the rules of this Policy.

Final Provisions

1. Severability clause. In the event that one or more provisions of the Policy are deemed invalid/irreconcilable, etc., such provisions shall be deemed replaced by valid provisions that are as close as possible in meaning. However, the Policy cannot be deemed invalid in its entirety under any circumstances.

Official notice

TRN: 104741067300003 D D A REAL ESTATE L.L.C Office No,4,, Abdullah Ahmed Abdullah Al
Mousa - Al Sufouh 2, Dubai, Dubai, 28282, Dubai
license: 1084263

E-mail: info@dda-realestate.com

Email (questions regarding Personal Data): info@dda-realestate.com

THE CONTACTS PROVIDED ARE THE ONLY OFFICIAL SOURCES OF
CONTACT WITH US. PLEASE BE CAREFUL!

Link to the document: <https://dda-realestate.com/docs/privacy-policy-en.pdf>

*The Policy is published in the public domain on the Internet information and
telecommunications network on the Operator's Website.*