

Privacy Statement

Oxygen Global DMCC

License Number: DMCC 197357

15 September 2025

In this policy, “us”, “we”, or “our” refers to Oxygen Global Pty Ltd and its related corporate bodies operating in the United Arab Emirates.

We are committed to protecting the privacy of all personal data provided to us and stored on the Oxygen website (and all related websites owned by Oxygen) (the Site), as outlined in this policy, in accordance with Federal Decree Law No. 45 of 2021 regarding the Protection of Personal Data (PDPL).

Personal Data

When used in this policy, the term “personal data” has the meaning given in Federal Decree Law No. 45 of 2021 (PDPL) and includes any data that identifies or can be used to identify a natural person directly or indirectly, including but not limited to name, identification number, location data, online identifier, or factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

Personal Data Collected

The types of personal data we may collect include, but are not limited to:

- Names and addresses
- Email addresses
- Phone numbers
- Profession, occupation, or job title
- Computer IP addresses
- Location data
- Online identifiers
- Any additional information you provide directly through our websites or indirectly through use of the Site

Cookies and Statistical Analysis

The Site uses cookies and similar technologies. When you visit the Site, certain information may be recorded for statistical purposes and to improve our products and services. The information that may be recorded includes:

- Server address
- Domain name
- Date and time of visit
- Previous websites visited
- Browser type and version
- Device information
- Geographic location data

By continuing to use our Site, you consent to our use of cookies. You can manage your cookie preferences through your browser settings by following instructions specific to your browser (e.g., clearing cookies or disabling them in the privacy settings).

Legal Basis for Processing Personal Data

We process your personal data based on the following legal grounds under the PDPL:

1. **Consent:** Where you have given explicit, informed, and freely given consent
2. **Contract Performance:** Where processing is necessary for the performance of a contract to which you are a party
3. **Legal Obligation:** Where processing is necessary for compliance with a legal obligation

4. **Vital Interests:** Where processing is necessary to protect vital interests
5. **Legitimate Interests:** Where processing is necessary for legitimate interests pursued by us or a third party

How Personal Data is Collected

We collect your personal data directly from you unless it is unreasonable or impractical to do so. This occurs through:

- In-person interactions
- Telephone communications
- The Site (including details entered upon registration or use of services) or email
- Customer feedback or survey forms
- Automated means such as cookies and similar technologies

We may also collect personal data from a third party where you have provided explicit consent for the data to be shared (e.g., an employer providing employee information to facilitate our services).

Purpose of Collecting, Holding, Using, and Disclosing Personal Data

The primary purpose for collecting your information is to enable us to perform our business activities, functions, and services and to provide effective customer service. We collect, hold, use, and disclose your personal data for:

- Providing products and services to you
- Informing you about existing and new products and services (subject to your marketing preferences)
- Communicating with you via email, mail, or telephone
- Managing and enhancing our products and services
- Personalizing and customizing your experience
- Verifying your identity and preventing fraud
- Providing business data to authorized third parties
- Investigating complaints or suspected breaches of our terms and conditions or unlawful activity
- Complying with legal and regulatory obligations
- As required or permitted by law

If you do not provide the personal data described:

- We may not be able to provide requested product or service information
- We may not be able to deliver requested products or services
- Your experience on the Site may be limited due to inability to tailor content

Your Rights as a Data Subject

Under the PDPL, you have the following rights:

- **Right of Access:** Confirm whether we process your personal data and access details about its processing.
- **Right to Rectification:** Request correction of inaccurate or incomplete personal data.
- **Right to Erasure:** Request deletion of personal data when no longer necessary, consent is withdrawn, or data is unlawfully processed.
- **Right to Restrict Processing:** Request restriction of processing in certain circumstances.

- **Right to Data Portability:** Receive your personal data in a structured, commonly used, machine-readable format and transmit it to another controller.
- **Right to Object:** Object to processing based on legitimate interests or for direct marketing.
- **Right to Withdraw Consent:** Withdraw consent at any time where processing is consent-based.
- **Right to Lodge a Complaint:** Complain with the UAE Data Office if your rights are violated.

We will respond to your requests to exercise these rights within 30 days, as required by the PDPL, unless an extension is permitted under applicable law.

Direct Marketing

We may use your personal data for direct marketing, including updates on products, services, and news, via mail, SMS, email, or other electronic means. We will only send marketing communications if:

- You have given explicit consent, or
- You are an existing customer, and the marketing relates to similar products/services

You may opt out of direct marketing by:

- Clicking the “unsubscribe” link in marketing emails
- Contacting us at info@oxygen-global.com
- Following opt-out instructions in any marketing communication

Cross-Border Data Transfers

We may transfer your personal data outside the UAE to countries with potentially different data protection levels. We ensure safeguards such as:

- Adequacy decisions by the UAE Data Office
- Standard contractual clauses approved by the UAE Data Office
- Other legally recognized transfer mechanisms

Disclosure of Personal Data

We may disclose your personal data to:

- Employees, contractors, or external service providers for Site operations or business functions
- Agents, business partners, or joint venture entities
- Authorised third parties
- Government authorities, law enforcement, or regulatory bodies, as required by law
- Professional advisors (e.g., lawyers, auditors, consultants)
- Third parties in connection with mergers, acquisitions, or asset sales

All third parties receiving your personal data must protect it in accordance with applicable laws.

Data Retention

We retain personal data only as long as necessary to fulfil its collection purpose, comply with legal obligations, resolve disputes, or enforce agreements. Unneeded data is securely deleted or anonymised.

Storage & Security of Personal Data

We implement technical and organisational measures to protect your personal data, including:

- Encryption of data in transit and at rest
- Access controls and authentication
- Regular security assessments
- Staff training on data protection

No transmission or storage method is completely secure, but we strive to protect your data. You can help by:

- Keeping passwords and accounts confidential
- Notifying us of unauthorised account use
- Using secure internet connections

Notify us immediately at info@oxygen-global.com if you suspect unauthorized access.

Data Protection Officer (DPO)

Our appointed DPO oversees PDPL compliance and handles data protection inquiries. Contact them at info@oxygen-global.com (subject: "DPO") for:

- Policy questions
- Data subject rights requests
- Complaints
- General inquiries

Automated Decision-Making and Profiling

If we use automated decision-making or profiling with significant effects, we will:

- Inform you of the processing
- Explain the logic, significance, and consequences
- Implement safeguards for your rights

You may request human intervention, express your view, or contest the decision.

Data Breach Notification

In case of a personal data breach, risking your rights:

- We will notify the UAE Data Office within 72 hours
- We will inform affected individuals without undue delay if there is a high risk
- We will document breaches and remedial actions

Links to Third-Party Websites

The Site may link to third-party websites. We are not responsible for their privacy practices. Review their policies before use.

Children's Privacy

Our services are not for individuals under 18. We do not knowingly collect their data and will delete it if discovered.

Contact Us and Exercising Your Rights

To exercise your rights or for questions, contact us:

Email: info@oxygen-global.com (use "DPO" in subject line for DPO matters)

Mail: Oxygen Global DMCC, Office 3602, HDS Tower, JLT, Dubai, UAE

Phone: +971 4 5681764

We may request identity verification. We will respond within 30 days, as per PDPL.

Complaints Process

If you believe we have breached the PDPL:

1. Contact us at info@oxygen-global.com or our DPO
2. We will investigate promptly and fairly
3. We will inform you of the outcome and actions taken
4. You may escalate to the UAE Data Office if unsatisfied

Privacy Policy Updates

We may update this policy to reflect changes in practices or laws. Updates will be posted on our website, accompanied by the "Last Updated" date. Material changes may include email or website notices. Continued use constitutes acceptance.

Last Updated: 15/09/2025

Governing Law

This policy is governed by UAE laws, including Federal Decree Law No. 45 of 2021 (PDPL) and other applicable regulations.