

PRIVACY POLICY

This policy describes how Empire collects, processes uses and discloses your personal information as a data controller, when you contact us, use our services or interact with our platforms including websites, public Wi-Fi network, social media and mobile apps (together "Platforms").

ACCEPTANCE

We recommend that you read this Privacy Notice carefully before you use our Websites or Products, visit our Property, or communicate with us in any manner. The practices described in this Privacy Notice are subject to applicable laws in the UAE.

BY ACCESSING OR INTERACTING WITH OUR WEBSITES OR PRODUCTS, VISITING OUR PROPERTY, OR COMMUNICATING WITH US IN ANY MANNER, YOU ARE ACCEPTING THE TERMS OF THIS PRIVACY NOTICE, WHICH MAY BE UPDATED AND AMENDED FROM TIME TO TIME.

WHAT THIS POLICY COVERS

We are committed to adopting the highest standards when it comes to how we collect, use and protect your personal information, and have accordingly developed this privacy policy (the "Policy"), which:

- Sets out the types of personal information we collect
- Explains how and why we collect and use your personal information
- Explains when and why we may share personal information within Empire and with other organisations
- Explains how we protect the personal information we collect
- Explains the rights and choices you have in relation to your personal information.

This Policy applies if you use our services (referred to in this Policy as "our Services"). Using our Services means:

- Buying/using our services or products from any channel over the phone, in house or online
- Using any of our platforms, including website, social media, public Wi-Fi networks, or mobile applications
- Taking part in promotions & competitions, registering to receive our newsletters and offers
- Registering for the Loyalty Card (if and when available)
- Registering for events
- Hire purposes of the various assets

This Policy also applies if you contact us or we contact you about our Services.

PERSONAL INFORMATION WE COLLECT

When you register for our services, we may collect:

- Your personal details, including your postal and billing addresses, email address(es), phone number(s), date of birth, gender, and passport or ID number
- Your account login details, such as your username and the password (encrypted) that you have chosen
- Your interests, preferences, income, and other profiling information

EMPIRE

When you browse our Websites, shop with us online or connect to Wi-Fi networks we provide, we may collect:

- Information about your online browsing behaviour on our Websites, and public networks and information about when you click on one of our adverts (including those shown on other organisations' websites)
- Information about devices you have used to access our Services (including the make, model and operating system, IP address, browser type and mobile device identifiers)
- Information about your precise geolocation.

When you contact us or we contact you or you take part in promotions, competitions, surveys or questionnaires about our Services, we may collect:

- Personal information you provide about yourself
- Details of emails and other digital communications we send to you including information about the emails you open and links in them that you click on
- Your feedback and contributions to customer surveys and questionnaires

Automatically when you access or interact with our websites or Products or visit our Assets and, for example, are in proximity to a Wi-Fi network, a Bluetooth Beacon, or a camera.

Other sources of personal information

We may also use personal information from other sources, such as specialist companies that supply information, online media channels, our partners and public registers. We may collect the following types of personal information about you from other sources: contact details, credit history, purchases, interests, preferences, or other types of publicly available information. This other personal information helps us to:

- Review and improve the accuracy of the data we hold
- Improve and measure the effectiveness of our marketing communications, including online advertising

We may be required by law to collect personal information about you or as a consequence of any contractual relationship we have with you.

If you choose not to provide your personal information to be used in accordance with this Policy, you will still be able to visit our Platforms but you may not be able to access certain options, products or services, and in some cases we may not be able to fulfil a service you request.

WHY AND HOW WE USE YOUR PERSONAL INFORMATION

Make our Services available to you

We use your personal information to provide you timely information and include you in various promotions.

- Processing your orders and refunds
- Managing the accounts you hold with us

This is so we can provide the services to you in line with our contractual obligations to you.

Personalise your experience

We may use your personal information to personalise the marketing messages we send to you and to make them more relevant and interesting, as this is in our legitimate business interests. Where necessary we will obtain your consent first. We may use your personal information for this purpose in the following ways:

- Using your online browsing behaviour as well as your in-store and online purchases to help us better understand you as a customer and provide you with personalised offers and services
- Providing you with relevant marketing communications (including by email, post, telephone, SMS, or online advertising), relating to products and services we offer, and those of our suppliers and partners. As part of this, online advertising may be displayed on Our Websites and on other organisations' websites and online media channels. We may also measure the effectiveness of our marketing communications and those of our suppliers and partners
- To help us to better understand you and provide you with services and marketing communications, that are relevant to your interests, we combine personal information we collect when you make purchases in-store with personal information collected from our Websites and other sources including the different subsidiaries associated with Empire

Contact and Interact with you

We may use your personal information when we communicate with you, in order to:

- Contact you about our Services, for example by phone, email or post or by responding to social media posts that you have directed at us
- Manage promotions and competitions you take part in, including those we run with our suppliers and partners
- Invite you to take part in and manage customer surveys, questionnaires and other market research activities carried out by Empire and by other organisations on our behalf

It is in our legitimate business interests that we are able to provide you with appropriate responses and provide you with notice about our services.

Manage and improve our day-to-day operations

We analyse information about how you use our services to:

- Manage and improve our Websites and other digital platforms
- Help to develop and improve our product range, services, stores, information technology systems, know-how and the way we communicate with you
- Detect and prevent fraud or other crime.

It is in our legitimate business interests to use the information provided to us for this purpose, so we can understand any issues with our services to improve it.

SHARING PERSONAL INFORMATION

We may share your personal information with third parties under the following circumstances:

Empire Sister Companies

We may share the personal information collected by us with our other Sister Companies for the purposes listed above.

Retail & Channel Partners

We may share your personal information with other companies that sell products through our Services ("**Retail & Channel Partners**"). We only share personal information that enables our Retail & Channel Partners to provide their services. For example, when you shop online (as required) or in-store we will give the relevant Partner your name, contact details, and address so that they can deliver your items.

Service Providers

We work with carefully selected Service Providers that carry out certain functions on our behalf. These include, for example, companies that help us with technology services, building, storing and combining data, processing payments and delivering orders. We only share personal information that enables our Service Providers to provide their services.

Some of the Service Providers we work with operate online media channels, and they place relevant online advertising for our products and services, as well as those of our suppliers and our Retail Channel Partners, on those online media channels on our behalf. For example, you may see an advert for our products and services when you use a particular social media site.

SHARING PERSONAL INFORMATION WITH OTHER ORGANISATIONS

We may share personal information with other organisations in the following circumstances:

- If any applicable law or a public authority says we must share the personal information
- If we need to share personal information in order to establish, exercise or defend our legal rights (this includes providing personal information to others for the purposes of preventing fraud and reducing credit risk)
- To an organisation we sell or transfer (or enter into negotiations to sell or transfer) any of our businesses or any of our rights or obligations under any agreement, we may have with you too. If the transfer or sale goes ahead, the organisation receiving your personal information can use your personal information in the same way as us
- To any other successors in titled to our business
- To anyone to whom we transfer or may transfer our rights and duties under our agreement with you

TRANSFER OF YOUR PERSONAL INFORMATION

Your personal information may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for personal information under European Union law or under the laws of your country of residence or our country of incorporation.

We will/have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data is adequately protected.

In the event your personal information is transferred to a foreign jurisdiction, it may be subject to the laws of that jurisdiction, and we may be required to disclose it to the courts, law enforcement or governmental authorities in those jurisdictions but we will only do so where required by applicable laws.

HOW WE PROTECT PERSONAL INFORMATION

We maintain physical, technical, and organisational safeguards to secure your personal information from unauthorised access, use, alteration and destruction. However, no internet-based site can be 100% secure and we cannot be held responsible for unauthorised or unintended access that is beyond our control.

SOCIAL MEDIA

We operate channels, pages and accounts on some social media sites to inform, assist and engage with customers. We monitor and record comments and posts made on these channels about us so that we can improve our services.

Empire is not responsible for any information posted on those sites other than information we have posted ourselves. We do not endorse the social media sites themselves or any information posted on them by third parties.

RETENTION

We keep records for as long as required to:

- a) Manage purchases, bookings, memberships and provide the other relevant products or services anticipated by this Privacy Policy, including keeping you up-to-date with our marketing
- b) Personalise the products, services and communications with you
- c) Comply with the applicable record retention legal requirements. When deciding how long to keep your personal information after our relationship with you has ended, we take into account our legal obligations and regulators' expectations.

If you wish to request that we no longer use your information to provide you services, contact us at: info@theEmpire.com

However, we will retain and use your registration information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

MARKETING COMMUNICATIONS

All marketing communications we send to you will provide you with a way to withdraw your consent to future marketing. If you no longer wish to receive promotional materials you may opt-out / unsubscribe from receiving these communications or change your account settings, this will remove you from marketing lists.

Please note that if you unsubscribe from marketing communications you will still receive operational and service messages from us regarding the services or products you bought from us and responses to enquiries made to us, and that we may hold your details on a suppression list so we don't send you marketing communications in the future.

COOKIES AND SIMILAR TECHNOLOGIES

We use cookies and similar technologies, such as tags and pixels (“Cookies”), to personalise and improve your customer experience as you use our Websites and to provide you with relevant online advertising. Cookies are small data files that allow a website or Mobile App to collect and store a range of data on your desktop computer, laptop or mobile device.

Cookies help us to provide important features and functionality on our Websites and we use them to improve your customer experience. For example, we use Cookies to do the following:

a) Improve the way our Websites work

Cookies allow us to improve the way our Websites work so that we can personalise your experience and allow you to use many of their useful features. For example, we use Cookies so we can remember your preferences and the contents of your shopping basket when you return to our Websites.

b) Improve the performance of our Websites

Cookies can help us to understand how our Websites are being used, for example, by telling us if you get an error messages as you browse. These Cookies collect data that is mostly aggregated and anonymous.

c) Deliver relevant online advertising

We use Cookies to help us deliver online advertising that we believe is most relevant to you on our Websites and other organisations’ websites.

Cookies used for this purpose are often placed on our Websites by other organisations, and always with our permission. These Cookies may collect information about your online behaviour, such as your IP address, the website you arrived from and information about your purchase history or the content of your shopping basket. This means that you may see our adverts on our Websites and on other organisations’ websites. You may also see adverts for other organisations on our Websites.

To help us to deliver online advertising that is relevant to you, we may also combine data we collect through Cookies in the browser of your desktop computer or other devices with other data that we have collected (e.g. Loyalty programme / Gift Cards / Registrations).

d) Measuring the effectiveness of our marketing communications, including online advertising

Cookies can tell us if you have seen a specific advert, and how long it has been since you have seen it. This information allows us to measure the effectiveness of our online advertising campaigns and control the number of times you are shown an advert.

We also use Cookies to measure the effectiveness of our marketing communications, for example by telling us if you have opened a marketing email that we have sent you.

e) Your choices when it comes to Cookies

You can use your browser settings to accept or reject new Cookies and to delete existing Cookies. You can also set your browser to notify you each time new Cookies are placed on your computer or other devices.

If you choose to disable some or all Cookies, you may not be able to make full use of our platforms. For example, you may not be able to add items to your shopping basket, proceed to checkout, or use some of our products and services that require you to sign in.

Once you have given us your consent to the use of cookies, we shall store cookies on your computer or device. If you wish to withdraw your consent at any time, you will need to delete our cookies using your internet browser settings.

Flash Cookies

Certain features of our Websites may use locally stored objects called flash cookies to collect and store information about your preferences and navigation to, from and on our Websites. We also use cookies to provide aggregate reporting. The cookies do not identify you as an individual or track your online behavior. We do not collect personal information from flash cookies and we will not associate them with your personal information.

Beacons

Our Websites and emails may contain small electronic files known as beacons (also referred to as web beacons, clear GIFs, pixel tags and single-pixel GIFs) that permit us for example, to count users who have visited those pages or opened an email and for other website-related statistics. Beacons in email marketing campaigns allow us to track your responses and your interests in our content, offerings and web pages. You may use the tools in your device to disable these technologies as well.

THIRD PARTY TRACKING / DO NOT TRACK

When you use our Websites, third parties may collect information about your online activities, over time and across different internet websites, online or cloud computing services, online applications, or mobile applications. Some browsers support a “Do Not Track” feature, which is intended to be a signal to websites that you do not wish to be tracked across different websites you visit. Our Websites are not currently set up to respond to “Do Not Track” signals and do not currently change the way they operate based upon detection of a “Do Not Track” or similar signal.

AGGREGATE DATA, DATA ANALYTICS AND SOCIAL MEDIA FUNCTIONALITY

We may aggregate personal information and remove any identifying elements in order to analyse patterns and improve our marketing and promotional efforts, to analyse Platform use, to improve our content and product offerings, and to customize our Platforms’ content, layout, products and services, and we may appoint third parties to do this on our behalf, as set out above.

We gather certain usage information like the number and frequency of visitors to our Platforms. This information may include which webpage you just came from, which webpage you next go to, what browser you are using, your device and your IP address. We only use such data in the aggregate. This collective data helps us to determine how much our customers use parts of our Platforms, and do research on our users’ demographics, interests, and behaviour to better understand and serve you.

EMPIRE

If you use buttons on our Platforms linked to social media or similar sites (for example "Like" and/or "Share" buttons), content from our Platforms may be sent back to that other website or service and, depending on your privacy settings, may be privately or publicly visible (for example to friends, followers, or generally to anyone who has access to your profile page).

Example - Please be advised that social media platforms may also collect information from you. When you click on a social plug-in, such as Facebook's "Like" button, Twitter's "tweet" button or the Google+, that particular social network's plugin will be activated and your browser will directly connect to that provider's servers. We do not have control over the collection, use and sharing practices of social media platforms. We encourage you to review their usage and disclosure policies and practices, including their data security practices, before using the social media platform.

YOUR RIGHTS

You have the right to see or access the personal information we hold about you. To receive a copy, please write to info@Empire.com

In addition, you have certain rights regarding your personal information, subject to local law. These include the following rights to:

- Rectify the information we hold about you
- Erase your personal information
- Restrict our use of your personal information
- Object to our use of your personal information
- Withdraw any consents you have provided for our use of your personal information
- Receive your personal information in a usable electronic format and transmit it to a third party (right to data portability)
- Lodge a complaint with your local data protection authority

If you would like to discuss or exercise such rights, please contact us at:

Empire
E info@TheEmpire.com

If you are concerned that any of the information we hold about you is incorrect, or out of date, please write to the address above to report your concerns and we will take appropriate steps to amend our records.

Please note that we will likely require additional information from you in order to honour your requests.

PRIVACY CONCERNS

If you have any concerns about our compliance with applicable privacy laws or this Privacy Policy please contact us at:

Empire
Dubai UAE
E info@theEmpire.com

We will endeavour to respond to your concerns as soon as possible.

NOTIFICATION OF CHANGES TO THIS PRIVACY POLICY

We update this Privacy Policy when needed and place updates on our platforms. If we are going to use your personal information in a manner different from that stated at the time of collection, we will notify you as required. All changes will become effective when posted unless indicated otherwise. Please review this Privacy Policy periodically for changes.

LINKS

Our Websites may contain links to other websites operated by other organisations that have their own privacy policies. Please make sure you read the terms and conditions and privacy policy carefully before providing any personal information on a website as we do not accept any responsibility or liability for websites of other organisations.

HOW WE STORE AND PROTECT YOUR PERSONAL INFORMATION

We have established reasonable organisational, technical and physical safeguards designed to limit who has access to your personal information, and to protect your personal information from unauthorised alteration, access, loss, theft, use or disclosure. These safeguards include, but are not limited to, access controls that are intended to restrict access to your personal information to authorised employees and contractors only.

We also rely on you to protect your personal information. Where we have provided you, or you have chosen, a password for access to certain parts of our Websites, you are responsible for ensuring that password is kept confidential. We ask that you do not share your password with others. We may act on any activity undertaken under your password. We also ask that you be careful about sharing your personal information in public spaces of the Websites like message boards. The information you share in public spaces may be viewed by other Website users or shared in other online locations.

No system can guarantee complete security of your personal information. We therefore cannot ensure or warrant that your personal information is secure from unauthorised third parties. Your use and access of our Websites, Products, and Properties, and your communications with us, are at your own risk.

INTERNATIONAL JURISDICTIONS

The Websites are hosted in the United Arab Emirates (UAE), and are subject to UAE law. If you access the Websites from other countries, please be advised that you are transferring your personal information into the UAE, and by using our Websites you consent to that transfer and use of your personal information in accordance with this Privacy Notice. You also agree to abide by the applicable laws of the UAE, including state and federal law and your agreements with us. Any persons accessing our Websites from any jurisdiction with laws or regulations governing the use of the Internet, including personal data collection, use and disclosure, different from those of the jurisdictions mentioned above may only use the Websites in a manner lawful in their jurisdiction. If your use of the Websites would be unlawful in your jurisdiction, you may not use the Websites.

GOVERNING LAW AND DISPUTE RESOLUTION

This policy is governed by the United Arab Emirates laws. Any disputes arising thereof, or connected thereto shall be settled by the Dubai courts between Empire and you.

CHILDREN

Our platforms are not directed towards children. If you are providing personal information for an individual less than 13 years of age, for whatever reason, you are providing us your affirmative parental consent as the legal parent or guardian to collect, use and process the information of the individual less than 13 years of age, consistent with this Privacy Policy.

Your continued use, access, or interaction with our Websites, Products, or Properties or your continued communication with us after the updated Privacy Notice has been posted (or any other indication of your consent) will constitute your acceptance of the updated Privacy Notice.

Last updated – 23 May 2022