

PRIVACY POLICY

1. INTRODUCTION

We take your privacy seriously and are committed to safeguarding your personal information at UPPERSETUP Technology LTD, a company incorporated under the laws of the UAE, registered under License DIFC- CL7070 at Unit No: 208, 209, Level 1, Gate Avenue - South Zone, DIFC, Dubai, UAE (hereinafter “UPPEROFFER”, “we”, “our” or “us”).

We respect your privacy and are dedicated to protecting your personal data in accordance with applicable data protection laws and our internal compliance standards. This Privacy Policy outlines the types of personal data we may collect from you or receive about you, the purposes for which we collect and process such data, and our practices relating to the collection, use, retention, transfer, protection, and disclosure of that data.

If you have any questions or concerns about this Privacy Policy or our handling of your personal information, please contact us at: support@upperoffer.com.

2. SOURCES OF PERSONAL DATA

Your personal data may be collected by UPPEROFFER from various sources in the context of your interaction with our services and platform (collectively, the “Platform”), including but not limited to:

- UPPEROFFER websites: This includes our main website and any affiliated websites or pages under our control.
- Electronic communications: Such as emails, text messages, messaging platforms, and in-app communications between you and UPPEROFFER.
- Mobile applications: Any apps developed or operated by UPPEROFFER or its authorized partners.
- Customer service interactions: Communications via chatbot, WhatsApp, phone calls, emails, or any other support channels.
- Online or offline forms: Data submitted through registration forms, surveys, or promotional campaigns, either electronically or physically.
- Advertising and analytics: Data gathered through interaction with UPPEROFFER’s online marketing and advertising, including on social media and partner platforms.
- Recruitment portals: Data submitted via our job application systems or hiring platforms.
- Internally generated data: Information created as a result of your use of our services or platform.
- External sources: Including social media platforms, market research agencies, publicly available databases, and information obtained via affiliates or third-party providers involved in service delivery.
- Public Wi-Fi networks: If you connect to UPPEROFFER’s network during events or business activities.

This policy does not apply to personal data collected:

- via third-party websites, applications, or services that are not controlled by UPPEROFFER;
- via any external links or advertising content that may be visible on our Platform but are managed independently.

3. INFORMATION WE COLLECT ABOUT YOU AND HOW WE USE YOUR PERSONAL INFORMATION

We collect various types of personal data from and about you when you interact with the UPPEROFFER Platform or use our Services. The specific categories of data and the purposes for which we process them are outlined below.

3.1 RESPONDING TO YOUR QUERIES OR EXPRESSIONS OF INTEREST

We process your personal information in order to respond to your enquiries, expressions of interest, or requests for information in line with our legitimate business interests and, where applicable, to perform a contract.

You may provide us with your personal data via:

- Our website, contact forms, or chatbot;
- Social media channels or instant messaging platforms (e.g. WhatsApp);
- Phone calls or email communications with our team;
- Visits to our offices or interaction with our consultants;
- Events, webinars or other offline/online activities;
- Third-party agents or affiliates who are authorized to promote our services.

We typically collect the following data for this purpose:

- Your full name
- Email address
- Phone number
- Nationality
- Content and context of your enquiry or expression of interest

If your enquiry relates to a specific Service (e.g. business registration or a request for an invoice), we may also collect and process information necessary to fulfil our contractual obligations. This may include verifying your identity and confirming eligibility for specific services or jurisdictions.

In some cases, we may also retain records of your interactions with our support team, including voice call recordings and chat transcripts, in order to ensure service quality and improve the effectiveness of our client support, in accordance with our legitimate interests and applicable regulations.

3.2 ENTERING INTO TERMS AND CONDITIONS

When you proceed to accept the Terms of Service and engage UPPEROFFER for the provision of Services, we may collect and process certain personal information necessary to formalize the contractual relationship. This includes, but is not limited to: your full name, passport details, visa information, address, national ID, and contact details. This data is collected and used for the purposes of contract performance and legal compliance.

3.3 REQUESTING FEEDBACK AND RESPONDING TO COMPLAINTS

We value your opinion and may request your feedback following your interaction with our Services or support team. This helps us monitor service quality and continuously improve. We may collect your name, email address, feedback or complaint content, and details of the transaction or service in question. Processing is based on our legitimate business interest in customer satisfaction and quality assurance.

If you do not wish to receive survey or feedback requests, you may opt out as outlined in Section “How to opt out”.

3.4 PERSONALIZED OFFERS AND SERVICE RECOMMENDATIONS

To provide you with a more relevant and customized experience, we may analyze and combine the data we collect from your interactions with our Platform. Based on your preferences and service history, we may send you tailored offers, updates about UPPEROFFER's services, or invitations to events. Communications may be sent via email, SMS, or in-app notifications, subject to your consent and preferences.

You may unsubscribe from such promotional communications at any time by following the instructions in the “How to opt out” section.

3.5 ADVERTISING

We may use your personal information to display and tailor advertising content across digital platforms, including social media and third-party partner websites. We may work with advertising partners who use cookies or similar technologies to serve ads based on your browsing history or interests.

You can manage your preferences or opt out from such advertising as described in the “How to opt out” section.

3.6 LEGAL COMPLIANCE AND PROTECTION OF RIGHTS

We may process and retain your personal data where required to comply with applicable laws and regulations, or to exercise or defend legal claims. This includes cooperation with regulators, enforcement of our contractual rights, and safeguarding our legal position. Such processing is based on our legitimate interest and/or legal obligation.

3.7 PAYMENT PROCESSING AND FRAUD PREVENTION

To process payments securely and protect against unauthorized or fraudulent activity, we may process your personal and transactional information. This includes sending you payment reminders or legal notifications for overdue payments. Such processing is performed to fulfill our contractual obligations, safeguard our business interests, and comply with applicable legal requirements.

3.8 OPT-OUT MANAGEMENT

If you inform us that you no longer wish to receive marketing or promotional materials, we will maintain a record of your opt-out request to ensure ongoing compliance. We may store your name, contact details, and opted-out preferences solely for this purpose.

You may opt back in at any time by contacting us at support@upperoffer.com, and we will be glad to resume sharing updates and offers relevant to you.

3.9 OTHER INFORMATION WE COLLECT

In addition to the personal data described above, we may also collect certain technical or statistical information that does not directly identify you as an individual. This information is collected automatically when you use our Platform or interact with our Services, and it supports our legitimate business interests in improving service quality and user experience.

We may collect:

- Technical data related to your device, browser type, IP address, operating system, time zone, and other system settings;
- Browsing actions and usage patterns across our websites and services;
- Details of your visits, including access time, page views, click paths, referring websites, and other communication metadata;
- Data collected via cookies, pixels, tags, or similar tracking technologies.

This information helps us to:

- Analyze usage and traffic trends to better understand our user base;
- Customize content and interfaces based on user preferences;
- Improve speed, accessibility, and personalization of our services;
- Ensure platform security and detect unusual usage patterns.

Technologies used may include:

- Cookies: Small text files stored on your device that help us remember your preferences and enhance functionality. These may include session cookies or persistent cookies depending on the context. For more information, please refer to our [Cookie Policy](#).
- Flash Cookies (Local Stored Objects): Used to collect and store information about your navigation preferences; managed independently of standard browser cookie settings.
- Web Beacons: Tiny graphics in emails or webpages that allow us to track engagement, such as whether emails were opened or links were clicked.

We use such tools to:

- Recognize returning users and maintain session continuity;
- Tailor platform content to your interests;
- Maintain login state;
- Help protect your account and secure our systems.

3.10 INFORMATION WE RECEIVE FROM THIRD PARTIES

We may receive personal data about you from third-party sources, including:

- Partners or agents acting on your behalf or promoting our Services;
- Individuals who refer you through loyalty or referral programs (e.g., “refer a friend”);
- Public sources or platforms where you have made your data available;
- Providers of third-party tools or services used on our Platform.

We request such parties to confirm that they have your consent to share your data or that there is a legal basis for doing so.

4. HOW TO OPT OUT?

You have the right to opt out of receiving marketing or promotional communications from us at any time. You can do so through any of the following methods:

1. Email: Send a message to support@upperoffer.com with the subject line: "Opt-Out".
2. Direct Contact: Reach out to us using the details provided in the section "Contacts" of this Policy.

Please note that even if you opt out of marketing communications, you may still receive essential service-related notifications, such as those related to your account or ongoing service delivery.

5. WHO MIGHT WE SHARE THIS INFORMATION WITH

We may share your personal information with third parties in accordance with this Privacy Policy and applicable data protection laws. The categories of recipients include:

- **Affiliates and Group Companies:** We may share your personal data with other entities within the UPPEROFFER group, including affiliated companies and subsidiaries, in order to provide you with Services, process payments, fulfil contractual obligations, tailor communication and offers, or improve your user experience. Some of these entities may be located outside the European Economic Area (EEA), including in jurisdictions such as the United Arab Emirates.
- **Service Providers and Vendors:** We engage third-party providers to perform specific services on our behalf, such as cloud hosting, IT infrastructure, marketing, analytics, payment processing, legal or audit services, and customer support. These parties may have access to your personal data to the extent required for the performance of their tasks, and they are contractually obligated to safeguard your data.
- **Select Business Partners:** Subject to your preferences and applicable law, we may share your information with selected business partners in sectors such as finance, travel, events, and lifestyle to offer you relevant discounts, benefits or co-branded services.
- **Legal and Regulatory Authorities:** Where required by law, court order, or regulation, we may disclose your personal information to competent authorities such as government bodies, regulators, or law enforcement.
- **In Business Transfers:** If UPPEROFFER is involved in a merger, acquisition, restructuring, asset sale, or similar transaction, your personal data may be transferred as part of that transaction, provided that the recipient is bound to maintain confidentiality and data protection standards.
- **Fraud Prevention and Risk Management:** We may share your data with relevant organizations for fraud detection, credit risk reduction, or to protect the rights, safety, and property of UPPEROFFER, our clients, or others.

International Data Transfers

Where personal information is transferred outside the EEA, including to Dubai or other jurisdictions where we or our service providers operate, we ensure that appropriate safeguards are in place.

These may include:

- Transferring data to countries recognized as providing an adequate level of protection by the European Commission; or
- Executing Standard Contractual Clauses (SCCs) approved by the European Commission or using other lawful transfer mechanisms under GDPR.

We take reasonable legal, technical, and organizational measures to ensure that your data remains protected during such transfers.

5. HOW LONG DO WE KEEP INFORMATION ABOUT YOU?

We retain personal data only for as long as necessary to fulfill the purposes outlined in this Privacy Policy or as required by applicable law. The specific retention period may vary depending on:

- The nature of the data collected;
- The purpose for which it was collected (e.g., contract performance, customer service, legal compliance);
- Legal, regulatory or contractual obligations requiring retention;
- The duration of your relationship with UPPEROFFER or the organization you represent.

For example, we may keep your data:

- For the duration of your contract with us or the company you represent;
- Until your enquiry has been resolved or your support request has been fulfilled;
- For an extended period where required to comply with recordkeeping obligations, tax laws, or for the establishment, exercise, or defense of legal claims.

Once your data is no longer needed, we will ensure its secure deletion or anonymization in accordance with our internal policies and data protection standards.

7. HOW SECURE IS YOUR INFORMATION?

At UPPEROFFER, safeguarding your personal data is a top priority. We implement and maintain appropriate technical and organizational measures to protect your data against unauthorized access, accidental loss, misuse, or alteration.

To ensure the secure transmission and storage of your data, we employ industry-standard encryption technologies and firewall protection. All data is stored on secure servers within controlled facilities.

Our security measures include:

- Strict confidentiality obligations for employees, contractors, and service providers who process personal data;
- Role-based access controls that ensure only authorized personnel can access your information on a need-to-know basis;
- Secure communication channels (e.g., HTTPS) for transmitting data;
- Data minimization and retention policies, including secure deletion or anonymization when data is no longer required;
- Ongoing monitoring and assessment of our systems and infrastructure to identify and mitigate vulnerabilities.

While we take every reasonable step to protect your data, no method of transmission over the internet or method of electronic storage is 100% secure. Accordingly, we cannot guarantee absolute security.

6. YOUR RIGHTS

Subject to applicable data protection laws (e.g., GDPR if you are located in the EEA), you may have the following rights in relation to your personal data:

If you wish to exercise any of the rights listed below, we may request verification of your identity before processing your request. In certain cases, we may charge a fee where permitted by law, for example, if the request is manifestly unfounded or excessive.

To exercise your rights, please contact our Data Privacy Office at support@upperoffer.com or via post at:

Data Privacy Office, UPPERSETUP Technology LTD, a company incorporated under the laws of the UAE, registered under License DIFC- CL7070 at Unit No: 208, 209, Level 1, Gate Avenue - South Zone, DIFC, Dubai, UAE.

Your rights may include:

- Right of Access: Obtain confirmation of whether we process your personal data and receive a copy of such data.
- Right to Rectification: Request corrections or updates to your personal data if inaccurate or incomplete.

- Right to Restrict Processing: Request limitation of how we process your personal data in specific circumstances.
- Right to Erasure ("Right to be Forgotten"): Request deletion of your personal data under conditions such as when it is no longer necessary, or where you have withdrawn your consent (unless exceptions apply).
- Right to Object: Object to processing based on our legitimate interest or for direct marketing purposes.
- Right to Data Portability: Receive a copy of your personal data in a structured, commonly used, and machine-readable format and request transmission to another controller, where technically feasible.
- Right to Withdraw Consent: Withdraw your consent for data processing at any time if processing is based on consent.

We will respond to your request within a reasonable timeframe and in accordance with applicable laws. In complex cases, we may require more time and will notify you accordingly.

Please note, in some instances we may be legally entitled to retain or otherwise deal with your personal data in a way that limits your rights, particularly where required to comply with regulatory obligations or to establish, exercise, or defend legal claims.

7. UPDATES TO THIS POLICY

We may revise this Privacy Policy from time to time to reflect changes in legal requirements or our processing practices. All updates will be posted on our website, and your continued use of the Platform after such changes signifies your acceptance of the updated terms.

We recommend checking this page periodically to stay informed about how we process and protect your personal data.

8. CONTACTS

If you have questions or concerns about this Privacy Policy or data handling, contact:

UPPERSETUP Technology LTD, a company incorporated under the laws of the UAE, registered under License DIFC- CL7070 at Unit No: 208, 209, Level 1, Gate Avenue - South Zone, DIFC, Dubai, UAE

Email: support@upperoffer.com

Website: <https://upperoffer.com>