



Privacy Policy

The website <https://dhahabsports.com/>, as well as the Dhahab Wallet app, together referred to as "DHAHAB SPORTS PLATFORM", deal with the virtual asset "DHAHAB SPORTS", follow the following Privacy Policy, in accordance with the General Data Protection Laws (LGPD/Brazil and GDPR/Europe) and other international laws and regulations on the protection of personal data.

INITIAL WARNING

This Privacy Policy refers to the processing of data collected by THE DHAHAB SPORTS PLATFORM. DHAHAB SPORTS PLATFORM values the privacy of its users and has created this Privacy Policy to demonstrate its commitment to protecting their privacy and personal data, under the General Law on the Protection of Personal Data and other laws and regulations on the subject, as well as describing how your privacy is protected by the DHAHAB SPORTS PLATFORM when collecting, treating and storing your personal information.

In addition, this policy generally applies to all Users and potential Users of the services offered by THE DHAHAB SPORTS PLATFORM, including Users of the websites or other means operated by the DHAHAB SPORTS PLATFORM and defines how the DHAHAB SPORTS PLATFORM may collect, produce, receive, classify, use, access, reproduce, transmit, distribute, process, archive, store, delete, evaluate or control information, modify, communicate, transfer, disseminate or extract the collected data, including personally identifiable information, in accordance with applicable legal bases and all applicable data protection and privacy laws. Finally, it should be emphasized that as updates occur, this document will gain new versions.

In addition, by accessing and/or using the <https://dhahabsports.com/> website, the User declares to be at least eighteen (eighteen) years old and has full and express capacity to accept the terms and conditions of this Privacy Policy.

If the User does not fit the above description and/or does not agree, even if in part, with the terms and conditions contained in this Privacy Policy, he/she shall not access and/or use the services offered by the DHAHAB SPORTS PLATFORM, as well as the websites and services operated by him/ her.

1. GENERAL INFORMATION AND DEFINITIONS

THE DHAHAB COIN PLATFORM values the privacy of its users and has created this Privacy Policy to demonstrate its commitment to protect their privacy and personal data, pursuant to the General Law on the Protection of Personal Data (LGPD/Brazil), General Data Protection Regulation (GDPR/Europe) and other laws on the subject, as well as to describe how their privacy is protected by the PLATFORM DHAHAB SPORTS when collecting, treating and storing your personal information.

In addition, it should be emphasized that as updates occur, this document will gain new versions.





1.1 Settings

- a) **User:** all individuals and/or persons who will use or visit the Site(s) and/or Application(s), over 18 (eighteen) years old or emancipated and fully capable of practicing the acts of civil life or those absolutely or relatively incapable properly represented or assisted.
- b) **Personal Data:** means any information provided and/or collected by DHAHAB SPORTS PLATFORM and/or its affiliates, by any means, even public, that: (I) identifies, or that, when used in combination with other information processed by THE DHAHAB SPORTS PLATFORM, identify an individual; or (II) whereby the identification or contact information of an individual may be derived. Personal Data may be in any media or format, including electronic or computerized records, as well as in paper-based files. Personal Data, however, does not include business phone, business mobile number, business address, business email.
- c) **Principles.** In all functions, tools and attributes of dhahab sports platform will be respected the principles of data protection, namely:
 - I. **Purpose:** the objective and purpose that DHAHAB SPORTS PLATFORM wishes to achieve from each act of processing personal information. Under current law, the purpose of the information and data collected is for specific purposes and previously specified to the user, mainly as described in the Terms of Use. In addition, the DHAHAB SPORTS PLATFORM will under no circumstances alter the data and information collected.
 - II. **Adequacy:** The information and data collected will be treated strictly appropriately, as described for the purpose of each collection.
 - III. **Need:** justification for which it is strictly necessary to collect personal data, to achieve the purpose, avoiding excessive collection. In this way, the DHAHAB SPORTS PLATFORM will only collect data or information when strictly necessary for the development of the purposes described in each collection.
 - IV. **Free access:** the user, natural/natural person, may, at any time, request the DHAHAB SPORTS PLATFORM, in its official communication channels, what their personal data are under the treatment of the DHAHAB SPORTS PLATFORM, as well as their personal data are processed, for what purpose and for how long they will be under the treatment of the DHAHAB SPORTS PLATFORM.
 - V. **Data quality:** The data and information collected and processed by the DHAHAB SPORTS PLATFORM will be true and updated, subject to the assumptions that the user provides untruthful information or that the user does not update his/her data for the period set out in this Privacy Policy or in the TERMS OF Use of the DHAHAB SPORTS PLATFORM.
 - VI. **Transparency:** personal data will always be treated with veracity and transparency by DHAHAB SPORTS PLATFORM, so the purposes and destination of the use of personal data will always be previously manifested to the user, and only used after the user's express consent.





VII. Security : THE DHAHAB SPORTS PLATFORM will take all appropriate measures that are within your power to prevent the invasion, alteration and sharing of data that may happen by unauthorized third parties. Subject, however, to the assumptions that intrusions, changes, sharing and other attacks occur due to the user's carelessness, mainly because they do not follow the recommendations of this Privacy Policy and the Terms of Use.

VIII. Prevention: THE DHAHAB SPORTS PLATFORM adopts protective and security measures for the data and personal information collected in order to prevent possible damage. However, the assumptions in which the damages occur by carelessness of the user, mainly for not following the recommendations of this Privacy Policy and the Terms of Use.

IX. Non-discrimination: DHAHAB SPORTS PLATFORM takes steps to preserve and respect sensitive personal data. In this sense, sensitive personal data are considered: racial or ethnic origin, religious conviction, political opinion, union membership or organization of a religious, philosophical or political nature, given to health or sexual life and genetic or biometric data.

d) **Legal bases:** legal basis that makes legitimate the processing of personal data for a certain prior purpose by the DHAHAB SPORTS PLATFORM. That is, legal authorisations that allow and justify the processing of data for specific purposes.

e) **Consent:** express and unambiguous authorization given by the User holding the personal data for THE DHAHAB SPORTS PLATFORM to treat his personal data for a previously described purpose, in which the legal basis necessary for the act requires the express authorization of the holder.

f) **Destination:** This policy generally applies to all Users and potential Users of the services offered by DHAHAB SPORTS PLATFORM, including Users of the websites or other means operated by the DHAHAB SPORTS PLATFORM and summarizes as the DHAHAB SPORTS PLATFORM may collect, produce, receive, classify, use, access, reproduce, transmit, distribute, process, archive, store, delete, evaluate or control information, modify, communicate, transfer, disseminate or extract the collected data, including personally identifiable information, in accordance with applicable legal bases and all applicable data protection and privacy laws.

By accessing and/or using the DHAHAB SPORTS PLATFORM, the User declares to be at least 18 (eighteen) years old and have full and express capacity to accept the terms and conditions of this Privacy Policy for all rights.

If the User does not fit the above description and/or does not agree, even if in part, with the terms and conditions contained in this Privacy Policy, he/she shall not access and/or use the services offered by the DHAHAB SPORTS PLATFORM, as well as the websites and services operated by him/ her.





2. PROPRIETARY AND DATA CONTROLLER

Depending on the provisions of the General Law on the Protection of Personal Data (LGPD/ Brazil) and GDPR/Europe, the owner responsible for the data processing is the Sports Agency Dhahab Sports.

2.1. Data Types Collected

Use of Data and other collected data

Full details about each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific callouts displayed prior to data collection.

Personal Data may be provided freely by the User, or, in the case of Usage Data, automatically collected when using the DHAHAB SPORTS PLATFORM. Unless otherwise specified, all Data requested by DHAHAB SPORTS PLATFORM is mandatory and failure to provide this Data may make it impossible for the platform to play regularly. In cases where the platform specifically states that some Data is not required, Users are free to stop communicating this Data without any consequence to the availability or operation of the platform.

Users who have questions about which Personal Data is required are invited to contact the DPO (data protection officer) at dpo@dhahabsports.com.

Any use of cookies – or other tracking tools on this platform – is intended to perform the actions provided in our forms. Users are responsible for any Personal Data of third parties that are obtained, published or shared through the functions of the DHAHAB SPORTS PLATFORM and confirm that they have the authorization of the third parties to provide the Data.

2.2. Processing method

DHAHAB SPORTS PLATFORM will take appropriate security measures to prevent unauthorized access, disclosure, alteration or unauthorized destruction of the Data obtained. Data processing is carried out using computers and /or its tools enabled, following organizational procedures and means strictly related to the purposes indicated in the forms. In addition to the DHAHAB SPORTS PLATFORM, in some cases, the Data may be accessed by certain types of persons in charge, involved with the operation of the platform (administration, sales, marketing, legal administration of the system, legal and other departments of the DHAHAB COIN PLATFORM) or external persons (such as third-party suppliers of technical services, postmen, hosting providers, IT companies, communication agencies) appointed, where necessary, as Data Processors by the DHAHAB SPORTS PLATFORM. The updated list of these parties may be requested from THE DHAHAB SPORTS PLATFORM at any time by e-mail contato@dhahabsports.com.

2.3. Legal basis for processing

THE DHAHAB SPORTS PLATFORM may process Personal Data related to the User if one of the following hypotheses applies:

- users have given their or her or her or her for one or more specific purposes.
- the provision of the Data is necessary for the fulfillment of a contract with the User and/or any pre-contractual obligations.

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- processing is necessary for the fulfilment of a legal obligation to which the DHAHAB SPORTS PLATFORM is subject;
- the processing relates to a task that is carried out in the public interest or in the exercise of an official authorisation in which the DHAHAB SPORTS PLATFORM is invested;
- processing is necessary for the purpose of legitimate interests pursued by DHAHAB SPORTS PLATFORM or by a third party.

In any case, the DHAHAB SPORTS PLATFORM will gladly cooperate to clarify which legal basis applies to the processing, and in particular if the provision of Data is a mandatory requirement under law or contract, or a requirement necessary to enter into a contract.

THE DHAHAB COIN PLATFORM only treats Personal Data in situations where it is legally authorized or with express and unequivocal consent of the User.

As described in this Policy, THE DHAHAB SPORTS PLATFORM has legal bases to collect, produce, receive, classify, use, access, reproduce, transmit, distribute, process, archive, store, delete, evaluate or control the information, modify, communicate, transfer, disseminate or extract data about the User.

Legal bases include your consent (collected expressly and unequivocally in the Consent Form), contracts and/or preliminary contractual procedures (in which processing is necessary to enter into the contract with the User) and/or legitimate interests, provided that such processing does not violate your rights and freedoms.

Such interests include protecting the User and the DHAHAB SPORTS PLATFORM from threats, complying with applicable law, exercising regular rights in judicial, administrative or arbitration proceedings, enabling the conduct or administration of business, including quality control, reports and services offered, managing business transactions, understanding and improving business and customer relationships, and enabling users to find economic opportunities.

The User has the right to deny or withdraw the consent provided to THE DHAHAB SPORTS PLATFORM, when this is the legal basis for the processing of personal data, and the DHAHAB SPORTS PLATFORM may terminate the achievement of its services for this user in the event of such request.

If you have questions about the legal bases for the collection, processing and storage of your personal data, please contact DHAHAB SPORTS PLATFORM and its *Data Protection Officer* via dpo@dhahabsports.com.

2.4. Place

The data is processed at dhahab sports platform operating facilities, and anywhere else where the parties involved with the processing are located. Depending on the User's location, data transfers may involve the transfer of User Data to a country other than your own.

2.5. Period of conservation

Personal Data will be processed and stored for as long as necessary for the purposes for which it is collected. So:





- Personal Data collected for the purposes related to the performance of a contract between DHAHAB SPORTS PLATFORM and the User will be retained until such contract has been fully fulfilled.
- Personal Data collected for purposes related to the legitimate interests of DHAHAB SPORTS PLATFORM will be retained for as long as necessary to fulfill such purposes. Users may obtain specific information about the legitimate interests pursued by the Owner within the relevant sections of this document and/or by contacting the DHAHAB SPORTS PLATFORM at dpo@dhahabsports.com.

THE DHAHAB SPORTS PLATFORM may be allowed to retain personal data for a longer period whenever the User has given his/her consent to such processing, until such authorization has been withdrawn. In addition, THE DHAHAB SPORTS PLATFORM may be obliged to retain Personal Data for a longer period of time at all times when it is obliged to do so in order to comply with a legal obligation or in compliance with a warrant from an authority.

Once the retention period expires the Personal Data will be erased. In this way the right to access, the right to erase, the right to correct and the right to portability of the data may not have its fulfillment required after the expiration of the retention period.

2.6. Consent

When the User registers and/or fills out forms offered by THE DHAHAB SPORTS PLATFORM, including on the websites operated by him, certain Personal Data requested will be kept confidential and will be used only for the purpose that motivated the registration.

The data will only be stored and processed with the user's free consent, as well as their full consent to the described purpose. Furthermore, personal data are treated with absolute secrecy.

Under LGPD/Brazil, GDPR/Europe and other laws on the subject, Personal Data is treated with privacy, being a fundamental right. However, fundamental rights may be diminished, provided that they are proportionate and reasonable. This policy strictly follows the dictates of the LGPD, CUDH (UN) and GDPR (Europe) and other laws on the subject, so the caveats to the rights provided here in it are examined proportionally and reasonably in each individual case.

3. COLLECTION AND USES OF PERSONAL INFORMATION

The User is aware that he/she provides information consciously and voluntarily through FORMS, or through the websites operated by the DHAHAB SPORTS PLATFORM.

When the User registers and/or fills out forms offered by THE DHAHAB SPORTS PLATFORM, including on the websites operated by him, certain Personal Data requested will be kept confidential and will be used only for the purpose that motivated the registration.

The following data and their purposes will be collected:

Name, E-mail and Company (In order to access content and receive promotional material, the DHAHAB SPORTS PLATFORM will need the User to provide his/her Name, E-mail and which Company he works in. THE DHAHAB SPORTS PLATFORM will send email marketing to users who provide this information. The Personal Data collected will not be used to send any kind of SPAM.)





Consent [I agree to provide my Name, Email and in which Company I work to access the material made available on the site, in addition to receiving newsletter from DHAHAB SPORTS PLATFORM and other marketing emails. I am aware that my provided data will be used internally for promotional purposes by DHAHAB SPORTS PLATFORM and agree to the receipt of emails from DHAHAB SPORTS PLATFORM.

Name, E-mail and Telephone (If the User wishes to contact the DHAHAB SPORTS PLATFORM through the "Contact Us" area available on the website, the DHAHAB SPORTS PLATFORM will need to collect The User's Name, Email and Telephone Number in order to contact the User.

Consent [I agree to provide my Name, Email and Phone for DHAHAB SPORTS PLATFORM to contact me, as well as aware that this data will be used by the Marketing and Commercial areas of DHAHAB SPORTS PLATFORM for sending emails.

For more information, please contact us at our data protection officer's email : dpo@dhahabsports.com.

4. SHARING AND PROCESSING OF PERSONAL INFORMATION

THE DHAHAB SPORTS PLATFORM will not make Personal Data collected on its websites available to email list brokers without your express consent.

THE DHAHAB SPORTS PLATFORM may disclose the Personal Data collected to third parties, in the following situations and to the limits required and authorized by law:

- I. with its customers and partners when necessary and/or appropriate to the provision of related services;
- II. With companies and individuals hired to perform certain activities and services on behalf of DHAHAB SPORTS PLATFORM;
- III. With companies from the DHAHAB SPORTS PLATFORM group;
- IV. With suppliers and partners to achieve the services contracted with the DHAHAB SPORTS PLATFORM (such as information technology, accounting, among others);
- V. For administrative purposes such as: research, planning, service development, security and risk management.
- VI. Where necessary as a result of legal obligation, determination of competent authority, or court decision.

In the case of sharing Personal Data with third parties, all subjects mentioned in items I to VI shall use the Personal Data shared in a manner consistently and in accordance with the purposes for which it was collected (or with which the User previously consented) and in accordance with what was determined by this Privacy Policy, other privacy statements of website or countries, and all applicable privacy and data protection laws.





5. LEGAL REASONS FOR THE DISCLOSURE OF YOUR DATA

In certain circumstances, THE DHAHAB SPORTS PLATFORM may disclose Personal Data, to the extent necessary or appropriate, to government agencies, consultants and other third parties for the purpose of complying with applicable law or with a court order or subpoena, or if THE DHAHAB SPORTS PLATFORM believes in good faith that such action is necessary to:

- I. Comply with legislation requiring such disclosure;
- II. Investigate, prevent or take measures related to suspected or actual illegal activities or to cooperate with public agencies or to protect national security;
- III. Execution of their contracts;
- IV. Investigate and defend yourself against any claims or allegations of third parties;
- V. Protect the security or integrity of services (e.g., sharing with companies that are experiencing similar threats);
- VI. Exercise or protect the rights, property and security of THE DHAHAB SPORTS PLATFORM and its related companies;
- VII. Protect the rights and personal safety of your employees, users, or the public;
- VIII. In case of sale, purchase, merger, reorganization, liquidation or dissolution of the company responsible for dhahab sports platform.

THE DHAHAB SPORTS PLATFORM will scientificise the respective Users on any legal demands that result in the disclosure of personal information, in accordance with what was set out in item 4, unless such scientificization is prohibited by law or prohibited by a court order or, even, if the request is emergency. DHAHAB SPORTS PLATFORM may challenge these demands if it deems that requests are excessive, vague or made by incompetent authorities.

6. USERS' RIGHTS

Users may exercise certain rights with respect to their Data processed by the DHAHAB SPORTS PLATFORM. In particular, Users have the rights to do the following:

- **Withdraw your opinion at any time.** Users have the right to withdraw their order in cases where they have previously given their opinion for the processing of their Personal Data.
- **Object to the processing of your Data.** Users have the right to object to the processing of their Data if the processing is performed on a legal basis other than the application.
- **Access your Data.** Users have the right to know if their Data is being processed by the DHAHAB SPORTS PLATFORM, obtain revelations about certain aspects of the processing and obtain a copy of the Data being processed.
- **Check and request rectification.** Users have the right to verify the accuracy of their Data and to request that it be updated or corrected.
- **Restrict the processing of your Data.** Users have the right, under certain circumstances, to restrict the processing of their Data for any purpose other than storage thereof.
- **Have your Personal Data deleted or otherwise withdrawn.** Users have the right, under certain circumstances, to obtain the deletion of their Owner Data.





- **Receive your Data and have it transferred to another controller.** Users have the right to receive their Data in a structured format, commonly used and able to be read by machines and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **File a complaint.** Users have the right to lodge a complaint with their competent data protection authority.

The User may make the requests listed above by contacting *our Data Protection Officer* via dpo@dhahabsports.com e-mail and [these](#) requests will be considered in accordance with applicable laws.

Six- Six. Details on the right to object to processing

In cases where Personal Data is processed in the public interest, in the exercise of an official authorization in which the DHAHAB SPORTS PLATFORM is invested or for the purposes of the legitimate interests pursued by the DHAHAB SPORTS PLATFORM, Users may object to such processing by providing a reason related to their particular situation to justify the objection.

Users should know, however, that if their Personal Data is processed for direct marketing purposes, Users may object to such processing at any time without providing any justification. Users can refer to the respective sections of this document.

Six- Two. How to exercise these rights

Any requests to exercise the rights of Users may be directed to the DHAHAB SPORTS PLATFORM, through the contact details provided in this document, at the end, in particular to the DPO, in the email dpo@dhahabsports.com. These requests may be exercised at no cost and will be met by the Owner as soon as possible and in all cases within less than one month.

7. ADDITIONAL INFORMATION ON DATA COLLECTION AND PROCESSING

7.1. Legal action

Users' Personal Data may be used for legal purposes by DHAHAB SPORTS PLATFORM, in court or in the steps leading to possible legal action arising from misuse of this policy or the functions of the platform. The User declares to be aware that the DHAHAB SPORTS PLATFORM may be obliged to disclose personal data upon request of government authorities.

7.2. Additional information about Your Personal Data

In addition to the information contained in this privacy policy, the platform may provide the User with additional and contextual information about the specific services or the collection and processing of Personal Data upon request.

Seven. System logs and maintenance

For operation and maintenance purposes, this platform and any third-party services may collect files that record interaction with this platform (system logs) or use other Personal Data (such as IP address) for this purpose.

Seven. Information not contained in this policy

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Further details on the collection or processing of Personal Data may be requested to DHAHAB SPORTS PLATFORM, at any time, through the official channels of communication, at the end arranged.

8. SECURITY OF PERSONAL INFORMATION

All Personal Data will be stored in the DHAHAB SPORTS PLATFORM database or in a database maintained "in the cloud" by service providers contracted by DHAHAB SPORTS PLATFORM, which are duly in accordance with current data legislation.

DHAHAB SPORTS PLATFORM and its suppliers use various security procedures to protect the confidentiality, security and integrity of your Personal Data, preventing any damages from the occurrence of such data.

Although DHAHAB SPORTS PLATFORM uses security measures and monitors your system to verify vulnerabilities and attacks to protect your Personal Data from unauthorized disclosure, misuse or alteration, the User understands and agrees that there are no guarantees that the information cannot be accessed, disclosed, altered or destroyed for violation of any of the physical protections, technical or administrative.

9. DATA RETENTION

THE DHAHAB SPORTS PLATFORM retains all data provided, including Personal Data, as long as the User's registration is active and as necessary to achieve its services.

DHAHAB SPORTS PLATFORM will retain your Personal Data and keep your data stored until any deletion request, or in accordance with the periods described in accordance with the purposes.

THE DHAHAB SPORTS PLATFORM may retain your Personal Data after receiving your request for deletion or after the deadlines of the purposes.

THE DHAHAB SPORTS PLATFORM will send email marketing to users who provide this information. The Personal Data collected will not be used to send any kind of SPAM.

10. PRIVACY POLICY REVIEWS

DHAHAB SPORTS PLATFORM reserves the right to make changes to this privacy policy at any time, by notifying its Users on this page and within the <https://dhahabsports.com/> website, and/or – to the extent technically and legally feasible – by sending a notice to Users through any contact information available to the DHAHAB SPORTS PLATFORM.

It is highly recommended to check this page regularly, referring to the date of the last modification reported at the bottom. Users will be notified of the changes, so if they continue to use this platform, they will be considered tacit acceptance of the new privacy policy.

If you do not agree to the new policy, you will not be able to use the DHAHAB SPORTS PLATFORM. In case of divergence between the new terms with the old ones, the new terms prevail.





11. CONTACT

DHAHAB SPORTS PLATFORM has appointed Luiz Henrique Lopes Jayme as Data *Protection Officer* ("DPO"). The User can contact the DPO at the email: dpo@dhahabsports.com.

12. DURATION

This Privacy Policy is effective March 15, 2022.

13. MEDIATION AND ELECTION FORO

This policy is subject to international laws and conventions on the protection of personal data. To resolve the issues arising from this policy, the Dubai Fora in the United Arab Emirates is elected.

For any technical questions and/or clarifications, please contact us by e-mail: dpo@dhahabsports.com. We are available 24 hours.

Also, to serve any user, we are available through online chat, 7 (seven) days a week, from 8 am to 6 pm, through Contact Us: online chat by clicking [here](https://tawk.to/chat/dhahabsports): <https://tawk.to/chat/dhahabsports>.

OFFICIAL COMMUNICATION CHANNELS:

Website: <https://dhahabsports.com>

Instagram: <https://instagram.com/dhahabsport>

Twitter: <https://twitter.com/dhahabsports>

Medium: <https://medium.com/@dhahabsports>

Telegram: <https://t.me/dhahabsports>

TikTok: <https://vm.tiktok.com/ZMLPfeMMR/>

Pinterest: <https://pin.it/dhahabsports>

Reddit: <https://www.reddit.com/dhahabsports>

