

# Privacy Policy of Pioneer Mobile App Development

Welcome to [Pioneer Mobile App Development](#) Website

Effective Date Aug 2020

## 1) INTRODUCTION

- 1.1. We respect your right to privacy and acknowledge the importance of protecting the information collected from you or about you when visiting and using the Website [www.pioneer-bh.com](http://www.pioneer-bh.com) (hereafter referred to as the “[Pioneer Mobile App Development](#)” or “**Site**”); therefore, we strive to be transparent in processing your data, and work hard to keep your data secure. By visiting the [Pioneer Mobile App Development](#) site directly or through another link, you accept the practices described in this policy.
- 1.2. Please read this policy carefully (together with our terms of use and other policies) which describes how your personal information is collected, used, and shared when you visit [Pioneer Mobile App Development](#) site, the steps we have taken to secure your personal information, and what are your legal rights and obligation and other practices, this policy help you to understand the way that we use your data and our reasons for doing so.
- 1.3. You acknowledge that your continued use of [Pioneer Mobile App Development](#) site after publishing or sending a notice about our changes to this privacy policy means that the collection, use and sharing of your personal information is subject to the updated privacy policy as of its effective date. If you do not agree to all the terms of this policy, then you may not use the website and services.

## 2) DEFINITIONS

In this policy, unless otherwise required by the context, the following terms shall have the meanings referred to.

- 2.1. “**We**”, “**Us**” or “**Our**”: shall refer to [Pioneer Mobile App Development](#) site.
- 2.2. “**User**”, “**you**” or “**your**”: shall refer to the person visiting or using the website or registering account.
- 2.3. “**Personal Information**”: shall refer to the data and information collected about the user or the data he provides to us, or the data collected about the devices he uses while communicating with the website or the data connected with visiting and using the website.
- 2.4. “**Other Information**”: shall mean any information that does not reveal your specific identity or does not directly relate to an individual, such as usage data.
- 2.5. “**Processing**”: shall refer to any operation which is performed upon personal information, whether or not by automatic means.
- 2.6. “**Data Processors (OR Service Providers)**”: shall refer to any natural or legal person who processes the data on behalf of the data controller; we may use the services of various service providers in order to process your data more effectively.
- 2.7. “**Policy**”: shall refer to this document as well as the terms contained herein.

## 3) SCOPE OF PRIVACY

- 3.1. This policy is applicable to [Pioneer Mobile App Development](#) site and to all services and other activities that are offered by us on or through the site, all the web pages that are part of the website.
- 3.2. This policy does not applicable to other websites or links to which we link, and specifically addresses our obligations in respect of applicable laws in the kingdom of **Bahrain**.

#### 4) GENERAL PRINCIPLES OF COLLECTION AND USE PERSONAL INFORMATION

To the extent applicable by law, when we collect personal information, we will:

- 4.1. Providing notice to you through the website about our practices.
- 4.2. Collecting your personal information only for specified and legitimate purposes.
- 4.3. Processing your personal information in a manner consistent with the purposes for which it was collected or to which you consented.
- 4.4. Take reasonable steps to ensure that your personal information is reliable, accurate, complete, and kept up-to-date.
- 4.5. Take appropriate measures to provide adequate protection for personal information that is disclosed to third parties.

#### 5) COLLECTION OF PERSONAL INFORMATION

Personal data or information means any information relating to a natural person which identifies the person or enables the identification of that person. We use different methods to collect personal information from and about you in connection with [Pioneer Mobile App Development](#) site, including information you provide directly to us and information we collect about your use of our Services. For example:

- 5.1. **Direct interactions:** You may provide certain personal information when registering the account (such as your name, address, telephone, and e-mail address) by filling in forms or by corresponding with us by email or otherwise. This includes personal data you provide when you register for e-mail alerts on this website; request information to be sent to you; or provide feedback to us.
- 5.2. **Usage information:** We collect membership subscription information and information relating to service purchase (including but not limited to service name, service type, duration of subscription, fees and other information).
- 5.3. **Contact information:** This information is for your communication with us regarding your requests or any inquiries about the site, includes the following contact information (full name, address of the request, title of the message and its subject)
- 5.4. **Automated technologies or interactions:** As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns such as internet protocol (IP) address used to connect your device to the internet, internet service provider, referral/exit pages, device ID, advertising ID, and operating system, types of add-ons, date and time, number of clicks, information about your use of our services, and data related to networked devices.
- 5.5. **Location information:** When you use our services, we may collect information about your location such as, your device's GPS signal or information about nearby Wi-Fi access points and cell towers that may be transmitted to us when you use certain services and enable the location function. You can change the privacy settings of your device to turn off the functionality to share your location information.
- 5.6. **Cookie information:** Cookies allow a web server to transfer data to a computer or device for archiving it and for other purposes. If you do not wish to collect information using cookies, you can stop or disable the use of cookies. For more information about our use of cookies, please review our cookie policy.
- 5.7. **Third parties:** We may receive personal data about you or aggregated technical data from external services providers contracted by [Pioneer Mobile App Development](#) to host or maintain certain sections of this website, and we may receive the information that is shared by advertisers, developers, publishers, affiliate partners and other third parties, or social media pages and platforms, for example, Facebook, Twitter and/or other.

## 6) USE OF PERSONAL INFORMATION

In providing our services to you, we and third parties we work with will collect, store, and use your personal information for the following purposes:

- 6.1. Provide the services and enable you to use them and manage your account.
- 6.2. Verify your identity, including during account creation and password reset operations.
- 6.3. Provide support and maintenance of the website and services.
- 6.4. Process and implement your purchase orders, process your payments, protect against fraudulent transactions, and send notices about your transactions.
- 6.5. Send administrative information to you, for example, to inform you of new services we will be providing and changes to our terms, conditions, and policies.
- 6.6. Provide you with marketing and promotional materials and offer other materials that we believe may be of interest to you, such as to send you newsletters or other direct communications.
- 6.7. Improving services, including by customizing the user experience.
- 6.8. Measuring service performance, improving content and planning.
- 6.9. Risk management, detection, prevention and / or treatment of fraud or other prohibited or illegal activities.
- 6.10. Protect our rights, those of the users, and help us prevent fraud.
- 6.11. Comply with our legal obligations, resolve any disputes we may have with any of our users, and implement our agreements.
- 6.12. Any other use after obtaining your consent for purposes other than those you have previously agreed to.

## 7) SHARE OF PERSONAL INFORMATION

We may share your information with third parties to provide the website and our services in the following limited circumstances:

- 7.1. **Share Information with Business Partners:** We may employ third party companies and individuals to facilitate our service ("Service Providers"), to provide the service on our behalf, to perform service-related services or to assist us in analyzing how our service is used. We will share this information in the following case:
  - 7.1.1. Support, maintain and provide our technology and IT infrastructure that supports our website and the storage of your information by IT TECHNOLOGY SERVICE PROVIDERS.
  - 7.1.2. Process and collect payment from you by PAYMENT SERVICE PROVIDERS.
  - 7.1.3. Access and process your information and associated orders in order to check for any fraudulent behavior by ANTI-FRAUD SERVICE PROVIDERS.
  - 7.1.4. Allow us to provide you with our customer service and improve and manage your customer experience by MANAGEMENT SERVICE PROVIDERS.
  - 7.1.5. Assist us in the improvement of the website by ANALYTICS SERVICE PROVIDERS.
  - 7.1.6. Help us with marketing by MARKETING TOOLS SERVICE PROVIDERS.
  - 7.1.7. Select and serve relevant adverts to you and others by ADVERTISING SERVICE PROVIDERS.
- 7.2. **Share Information for Legal obligations:** We will also share your personal information with any entity to which we are under a duty to disclose or share your information in order to comply with any legal obligation or other legal process, or in order to enforce or apply our Terms and other legal requirements; or to protect our rights, property, or safety, our users, or others: or for the purposes of fraud protection and credit risk reduction.

7.3. You grant us the right to allow our employees and service providers to deal with your personal data within the limits of providing the services.

Please note that any third parties' use of your personal information will be governed by their own privacy policies. We recommend you carefully review privacy policies to the third parties.

## 8) LEGAL DISCLOSURE

In the event we go through a business transition, we may share personal information to a third party in connection with negotiations such as merger, acquisitions, reorganization, asset sale, joint venture, assignment, transfer or any similar disposition of all or any portion of our business or assets, and then the new owners may use your personal information in the same way as set out in this privacy notice.

## 9) RETENTION PERIOD OF PERSONAL INFORMATION

9.1. We are committed to preserving the confidentiality of your data and information, and we undertake within the limits legally permitted not to disclose or use them in a way that conflicts with your right to privacy, and we will not rent or sell personally identifying information to anyone.

9.2. **Pioneer Mobile App Development** site will retain your personal information associated with your account in our archives for the period necessary to fulfill the purposes set out in this policy unless a longer retention period is required or permitted by laws of the State of **Bahrain**. How long we keep your personal information will vary depending on the purpose and use of information collected.

9.3. We may also retain your personal information as necessary to the following:

9.3.1. To analysis, security, or audit purposes.

9.3.2. To comply with retention requirements under the law.

9.3.3. To deal with any complaints regarding the services.

9.3.4. To comply with our legal obligations, protect or defend our rights, resolve disputes and enforce our contracts.

9.4. The criteria used to determine our retention periods include:

9.4.1. The length of time we have an ongoing relationship with you and provide the services to you (for example, for as long as you have an account with us or keep using the services).

9.4.2. If there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them).

9.4.3. If retention is necessary for our legal position (such as for statutes of limitations, litigation or regulatory investigations).

## 10) PROCESSING OF PERSONAL INFORMATION

10.1. We process your personal information for the following purposes:

10.1.1. To the performance of the contract we have with you and the relationship with you which is regulated by the terms and conditions (such as if you use our services, we will use your information to carry out our obligation to complete your order).

10.1.2. To comply with legal obligations to which we are subject (such as tax obligations, and when we are obliged to comply with lawful requests from competent authorities such as law enforcement).

10.1.3. To serve and meet our legitimate interests (such as enhancing your experience with our services, carrying out online advertising, and for fraud detection), we take steps to ensure that your rights with respect to your personal information are not infringed.

10.1.4. For research, analytical, statistical purposes, and to identify services that may be of interest to you, it is on the basis of the legitimate interest of us.

10.2. Where personal information is processed for these purposes, the privacy impact on the users whose information is being processed will be considered.

## **11) PROTECTION OF PERSONAL INFORMATION**

11.1. The security of your data is important to us, so we seek to preserve all user information and not be viewed by any person in contrary to our policy in force. We also work to protect this information through protected by electronic protection systems.

11.2. We take all necessary and appropriate security measures to protect your personal information from loss, damage, alteration, disclosure, unauthorized access or unintentional and unlawful use. However, this level of protection cannot be 100% effective unless you have your own security policies. You should not share your account data with anyone, especially your password, and if you are concerned that any of your personal data has been disclosed, you must change it immediately after you sign in to your account.

## **12) TRANSFER OF PERSONAL INFORMATION**

12.1. Your information, including personal data, may be transferred to and maintained on – computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

12.2. Your consent to this privacy policy followed by your submission of such information represents your agreement to that transfer.

12.3. We take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy and no transfer of your personal data will take place to an organization or a country unless there are adequate controls in place, including the security of your data and other personal information.

## **13) E-PAYMENT INFORMATION**

13.1. The e-payment service shall be provided through [Pioneer Mobile App Development](#) site through a secure and approved e-payment gateway, this service allows users to pay through the website electronically, and we make it clear that the website does not retain the user's payment data.

13.2. Payments data is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS, which is a joint effort of brands like Visa and MasterCard. PCI-DSS requirements help ensure the secure handling of payment information.

## **14) SENSITIVE INFORMATION & CHILDREN INFORMATION**

14.1. We do not collect any sensitive personal information regarding users of the Website (such as information relating to ethnic origin, religious beliefs, political opinions, health, medical condition, criminal background, etc.) when using the services.

14.2. We do not knowingly collect any information relating to children and do not intend to do so in the future. If you become aware that your child has provided us with personal information without your consent, please contact us using the contact details to confirm that the information has been removed and cancel their participation in any marketing communications.

## **15) SOCIAL MEDIA PLATFORMS**

We may interact with registered users of various social media platforms, including Twitter and Instagram. Please note that any content you post to such platforms (e.g., pictures, information or opinions), as well as any personal information that you otherwise make available to users (e.g., your profile), is subject to the applicable social media platform's terms of use and privacy policies. We recommend that you review this information carefully in order to better understand your rights and obligations with regard to such content.

## **16) MANAGE YOUR PRIVACY**

- 16.1. You have a great role in protecting your personal information and data, and you can do the following:
  - 16.1.1. View, control or modify the information that identifies you through your account at the website.
  - 16.1.2. Not to disclose your account or password information to anyone else.
  - 16.1.3. Log out always at the end of your session, especially if you are using someone else's computer or in public Internet places.
- 16.2. **Pioneer Mobile App Development** site assumes no responsibility for any actions resulting from third parties' access to your information due to your failure to keep the confidentiality of your personal information.

## **17) EXTERNAL LINKS**

- 17.1. **Pioneer Mobile App Development** site or the services may include links or ads to other third parties. Clicking on those links or enabling those connections may allow third parties to collect or share data about you, which will be used by them in accordance with their privacy policy, which may differ from this Privacy Policy. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.
- 17.2. In addition, we are not responsible for the information collection, use, disclosure, or security policies or practices of other organizations, such as Facebook Twitter or any social media platform provider, operating system provider, wireless service provider or device manufacturer, we recommend that you review the privacy policies of these organizations and websites carefully in order to better understand your rights and obligations.

## **18) COOKIES POLICY**

- 18.1. Cookies are small data files, often including a unique identifier, which sent to your computer, mobile phone or tablet device ("**device**") by the web server so the website can remember some information about your browsing activity on the website. The cookie will collect information relating to your use of our Services, information about your device, e.g. the device's IP address and browser type, broad location and, if you arrived at our site via a link from third party site, the URL of the linking page. If you have registered for any Services or you are a subscriber, it may also collect your name and email address, which may be transferred to data processors for registered user or subscriber verification purposes.
- 18.2. We may use cookies and other similar technologies while you access the website as part of our marketing efforts and for such purposes as to recognize the device that you are using to access the services, avoid the need to re-enter details on different occasions, enhance security, facilitate navigation, personalize your experience, and to collect information about your usage, activity on our website, understand how the services are used, and measure the effectiveness of ads. Our third-party service providers, advertisers and partners may also place similar technologies on our website. The use of these technologies by such third parties is subject to their own privacy policies and is not covered by this policy, except as required by law.

- 18.3. Some web browsers may give you the ability to enable a “**Do Not Track**” feature that sends signals to the websites you visit, indicating that you do not want your online activities tracked. This is different than blocking or deleting Cookies, as browsers with this feature enabled may still accept Cookies.
- 18.4. We may use the information we obtain from your use of our cookies for the following purposes:
  - 18.4.1. To distinguish you from other users of the site.
  - 18.4.2. To provide you with a good experience when you browse the site.
  - 18.4.3. To allow us to improve the site.
  - 18.4.4. To track and target users' interests.
  - 18.4.5. To analyze the use of the site.
  - 18.4.6. To target advertisements which may be of particular interest to you.

## 19) CHANGES OF POLICY

- 19.1. From time to time, we reserve the right to make amendments or changes to this Policy; we encourage you to review this policy periodically to ensure that you understand how we collect, use, and share information through [Pioneer Mobile App Development](#) site and its services; If we do make changes to this policy, we will also update the “**Effective Date**” posted at the top of the policy.
- 19.2. Any changes to this policy will become effective once the revised version is posted on the website. By continuing to use the website services following such changes, you are agreeing to accept the terms of the revised policy.