Privacy Policy of Yusr Platform
for lending product

Effective Date: 26/06/2026 Version: 1.0

1. Introduction

1.1. This Privacy Policy explains how personal data of users ("you" or "Customer") is collected, processed, used, disclosed and protected by Yusr Tech Forfaiting L.L.C S.O.C. ("Yusr", "we", "us", or "our") through the use of its platform (accessible via website and mobile application) that serves as a dedicated financing gateway enabling customers in the United Arab Emirates ("UAE") who have already agreed upon a purchase with a third-party merchant ("Merchant") to apply for, accept, and manage a short-term consumer financing facility ("Loan") originated by Yusr as agent of a UAE-licensed finance company (the "Licensed Principal") authorised by the Central Bank of the UAE ("CBUAE") under the Finance Companies Regulation (CBUAE Circular No. 3/2023).

1.2. The Company processes personal data in accordance with UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data, its Executive Regulations, and any guidance or decisions issued by the UAE Data Office or other competent authorities.

1.3. By accessing or using Yusr's platfor, you confirm that you have read, understood, and agreed to this Privacy Policy. If you do not agree, you should refrain from using the platform.

2. Identity of the Data Controller

2.1. Yusr Tech Forfaiting L.L.C S.O.C. is the data controller of your personal data for the purposes described in this Policy and is incorporated in accordance with the laws of the United Arab Emirates, with its registered office at 49-0, Ontario Tower, Business Bay, Dubai. Where Yusr acts as agent of the Licensed Principal in originating and administering Loans, the Licensed Principal independently processes certain customer data for its own regulatory compliance purposes and acts as a separate data controller in that capacity.

2.2. Yusr has appointed a Data Protection Officer (DPO), responsible for overseeing inquiries related to this Policy and the exercise of your rights. You may contact our DPO at: legal@yusr.ae.

3. Scope and Applicability

3.1. This Privacy Policy applies to all personal data collected through our website, mobile application, and any related services offered through Yusr.

3.2. This Privacy Policy does not apply to third-party websites, applications, or platforms that may be linked through Yusr. We are not responsible for the data collection practices or content of third-party services.

4. Personal Data We Collect

4.1. We collect and process the following categories of personal data from you when you register, use our platform, or interact with us for the purpose of entering into and performing the service agreement:

(a) Full name;
(b) Phone number;
(c) Email address;
(d) Merchant Invoice details, including invoice number, amount, and Merchant identity, submitted in connection with a Loan application;
(e) Emirates ID data (including number, nationality, name, and expiry);
(f) Passport copy;
(g) Live facial photo (selfie);
(h) Loan and repayment data, including Loan amounts, instalment schedules, payment history, and default status;
(i) Credit bureau data obtained from or reported to the Al Etihad Credit Bureau (AECB), including credit scores and payment conduct records;
(j) Credit/debit card number or masked payment information.

4.2. In addition to the above, we may collect the following technical and behavioral data:

(a) IP address, browser type, operating system, device type, location data;
(b) Information on platform usage, session duration, clicks, and preferences;
(c) Communication logs with our support team, including messages and call recordings.

5. How We Collect Your Data

5.1. We collect personal data:

(a) Directly from you when you create an account, complete onboarding steps, or communicate with us;
(b) From documents you upload or submit as part of Know-Your-Customer (KYC) and verification procedures;
(c) Indirectly from third parties including Merchants, payment processors, fraud detection providers, and credit agencies.

6. Legal Basis for Processing

6.1. We rely on the following lawful bases under Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data, Law No. (26) of 2015 Regulating Data Dissemination and Exchange in the Emirate of Dubai and Federal Decree Law No. 34 of 2021 on Combatting Rumours and Cybercrimes:

(a) Your consent, where required (e.g. for marketing communications);
(b) Performance of a contract or steps necessary to enter into a contract with you (e.g. processing your application or originating, disbursing, and administering a Loan on behalf of the Licensed Principal); and (e) Our legitimate interests and legal obligations in connection with conducting AECB credit bureau checks as required by the Finance Companies Regulation (CBUAE Circular No. 3/2023) for Loans above AED 5,000, and reporting payment conduct to the AECB as required by applicable UAE law.
(c) Compliance with legal obligations, including KYC requirements, anti-fraud obligations and cooperation with competent authorities;
(d) Our legitimate interests, provided such interests are not overridden by your fundamental rights and freedoms.

7. Purposes for Processing

7.1. We process your personal data for the following purposes:

(a) To assess your application and eligibility for a Loan, including conducting credit scoring and verification;
(b) To originate, disburse, and administer Loans on behalf of the Licensed Principal, including presenting the Loan offer and Key Facts Statement prior to your acceptance;
(c) To create, manage, and administer your customer account;
(d) To provide the Licensed Principal with data necessary for its regulatory oversight, CBUAE reporting, and AML/CFT compliance obligations under the Finance Companies Regulation (CBUAE Circular No. 3/2023);
(e) To carry out identity verification and fraud prevention;
(f) To perform internal record-keeping, audits, and reporting;
(g) To communicate with you regarding transactions, updates, or policy changes;
(h) To send optional marketing communications if consented;
(i) To comply with legal and regulatory requirements, including mandatory AECB credit checks and payment-conduct reporting under the Finance Companies Regulation (CBUAE Circular No. 3/2023).

8. Data Sharing and Disclosure

8.1. We may share your personal data with the following parties for the purposes described in this Privacy Policy, in accordance with UAE data protection law:

(a) Merchants, strictly for the purpose of verifying Merchant Invoices, coordinating returns and refunds, and resolving disputes in connection with a Loan. The purchase agreement between you and the Merchant is concluded outside the Platform; Yusr shares data with Merchants only to the extent necessary for Loan administration;

(a1) The Licensed Principal — the UAE-licensed finance company on whose behalf Yusr acts as agent — which receives customer identity, creditworthiness, Loan, and repayment data necessary to originate, oversee, and report on Loans under its CBUAE authorisation. The Licensed Principal acts as an independent data controller for its own regulatory compliance and AML/CFT purposes, and its processing of your data is subject to its own privacy notices;

(b) The Al Etihad Credit Bureau (AECB), which receives credit enquiry requests and payment-conduct reports as required by the Finance Companies Regulation (CBUAE Circular No. 3/2023). AECB reporting is a regulatory obligation; missed or late payments may be recorded and may negatively affect your credit score. Debt collection agencies authorised by Yusr, where you are in default, for the purpose of recovering overdue Loan amounts under Yusr's rights as lender/servicer;

(c) Regulatory authorities, law enforcement agencies, courts, and government institutions, if required by applicable law or pursuant to a lawful order;

(d) Our third-party service providers (including cloud hosting, KYC verification services, IT support, payment processors, and communication providers), who process personal data on our behalf under contractual obligations to safeguard confidentiality and data integrity;

(e) Our professional advisors, including lawyers, auditors, and compliance consultants, to the extent reasonably necessary for compliance or to protect our legitimate interests;

(f) Any entity acquiring all or part of our business or assets, subject to confidentiality undertakings and compliance with applicable legal obligations.

8.2. We do not permit our service providers or any third parties to use your personal data for their own purposes, and we only permit them to process your data for specific purposes in accordance with our written instructions.

9. Electronic Communication and OTP Authentication

9.1. By creating an account and submitting your mobile number or email address, you authorize Yusr to communicate with you via SMS, email, in-app notifications, or WhatsApp messages for service-related notifications, verification codes, and contractual notices.

9.2. You agree that receipt of a one-time-password (OTP) and submission through the platform shall constitute your electronic signature under UAE Federal Decree Law No. 46 of 2021 on Electronic Transactions and Trust Services.

9.3. You acknowledge that such electronic communications have the same legal value and enforceability as handwritten signatures or physical documentation.

10. Data Retention

10.1. We retain your personal data for as long as is necessary to fulfill the purposes for which it was collected, including for the performance of our contractual relationship and compliance with applicable laws.

10.2. Where no longer required, your data will be securely deleted or anonymized unless continued retention is required for legal, regulatory, or dispute resolution purposes.

10.3. The standard retention periods are:

10.3.1. Contractual and identity information: minimum five (5) years after account closure;

10.3.2. Financial and transaction data: as required under VAT and financial regulations, and in no case less than five (5) years for Loan records, KFS, repayment schedules, and AECB reports, as required by the Finance Companies Regulation (CBUAE Circular No. 3/2023) and UAE AML legislation;

10.3.3. Marketing data: until withdrawal of consent or objection to processing.

11. Data Security

11.1. We implement technical, physical, and organizational security measures to safeguard your personal data from accidental loss, unauthorized access, misuse, alteration, or disclosure.

11.2. Access to personal data is limited to personnel and contractors who have a business need to know and who are bound by confidentiality obligations.

11.3. We regularly review our data security practices, encryption standards, and business continuity plans to align with evolving threats and regulatory requirements.

11.4. Yusr maintains internal records of all personal-data processing activities in accordance with the accountability principle under Article 7 of the PDPL. For any processing likely to present a high risk to individual rights, Yusr conducts a Data Protection Impact Assessment (DPIA) to evaluate and mitigate such risks before processing begins.

12. Your Rights

12.1. Subject to the conditions under UAE Federal Decree Law No. 45 of 2021, you may have the following rights:

(a) The right to access your personal data held by us;
(b) The right to request rectification of inaccurate or incomplete data;
(c) The right to object to or restrict processing in specific cases;
(d) The right to request erasure where processing is no longer necessary or lawful;
(e) The right to withdraw consent for processing where consent was the basis;
(f) The right to data portability in a structured, machine-readable format.

12.2. To exercise any of the rights above, please contact us at legal@yusr.ae. We may request identification and supporting documentation to verify your identity.
12.3. Yusr will respond to verified data-subject requests within thirty (30) days of receipt, extendable once by an additional thirty (30) days where necessary due to complexity or volume, in accordance with Article 15 of the PDPL. All responses will be transparent, reasoned, and provided through secure electronic communication unless otherwise requested.

13. Minors
13.1. Our platform is not intended for persons under the age of eighteen (18). We do not knowingly collect personal data from minors.
13.2. If we become aware that a minor has provided personal data without verifiable parental consent, we will delete such data from our records.

14. Consent for Marketing Communications
14.1. We may send you promotional emails or SMS only where you have provided prior express consent or where permitted under applicable law.
14.2. You may opt out of receiving marketing communications at any time by clicking the unsubscribe link in the message or updating your preferences via your user account.
14.3. Opting out of marketing will not affect service or transactional messages.

15. Cookies and Similar Technologies
15.1. We use cookies and similar tracking technologies to enhance your user experience, personalize content, and analyze platform usage.
15.2. You may manage your cookie preferences via browser settings. Disabling cookies may affect some functionalities of the platform.

16. Third-Party Links
16.1. Our platform may contain links to third-party websites or services not operated by Yusr. We do not control these third parties and are not responsible for their privacy practices.
16.2. We encourage you to review the privacy policies of any third-party services you access through our platform.

17. Amendments to this Policy
17.1. Yusr may amend this Privacy Policy from time to time to reflect changes in legal requirements, business practices, or technological advancements.
17.2. Updates will be posted on the platform with the "Effective Date" updated accordingly. You are encouraged to review this Policy periodically.
17.3. If required by law, we will notify you of material changes via email or through a platform notice.

18. Contact and Complaints

18.1. For any inquiries, requests, or complaints concerning this Privacy Policy or your personal data, you may contact us via:
Email: legal@yusr.ae
Postal Address: 49-0, Ontario Tower, Business Bay, Dubai
Data Protection Officer: legal@yusr.ae

18.2. If you are not satisfied with our response, you have the right to lodge a complaint with the UAE Data Office or other competent authority under applicable law.

18.3. In accordance with Article 9 of Federal Decree-Law No. 45 of 2021, Yusr shall, without undue delay, notify the UAE Data Office of any personal-data breach that may pose a risk to the privacy or rights of individuals. Where appropriate, affected individuals will also be informed promptly and in clear language. Notifications will include the nature of the breach, categories of affected data, likely consequences, and remedial actions taken to mitigate the impact.