Tawasal Privacy Policy

1. Introduction

This Privacy Policy sets out how we, Tawasul Information Technology LLC **("Tawasal")**, use and protect your personal data that you provide to us, or that is otherwise obtained or generated by us, in connection with your use of our cloud-based messaging services (the **"Services"**). For the purposes of this Privacy Policy, **'we'**, **'us'** and **'our'** refers to Tawasal, and **'you'** refers to you, the user of the Services.

1.1 Privacy Principles

Tawasal has two fundamental principles when it comes to collecting and processing private data:

- We don't use your data to show you ads.
- We only store the data that Tawasal needs to function as a secure and feature-rich messaging service.

2. Legal Ground for Processing Your Personal Data

We process your personal data on the ground that such processing is necessary to further our legitimate interests (including: (1) providing effective and innovative Services to our users; and (2) to detect, prevent or otherwise address fraud or security issues in respect of our provision of Services), unless those interests are overridden by your interest or fundamental rights and freedoms that require protections of personal data.

3. What Personal Data We Use

3.1. Basic Account Data

Tawasal is a communication service. You provide your mobile number and basic account data (which may include profile name, profile picture and about information) to create a Tawasal account.

To make it easier for your contacts and other people to reach you and recognize who you are, the screen name you choose, your profile pictures, and your username (should you choose to set one) on Tawasal are always public. We don't want to know your real name, gender, age or what you like.

We do **not** require your screen name to be your real name. Note that users who have you in their contacts will see you by the name they saved and not by your screen name.

3.2. Your Messages

3.2.1. Cloud Chats

Tawasal is a cloud service. We store messages, photos, videos and documents from your cloud chats on our servers so that you can access your data from any of your devices anytime without having to rely on third-party backups. All data is stored heavily encrypted and the encryption keys in each case are stored in several other data centers in different jurisdictions. This way local engineers or physical intruders cannot get access to user data.

3.2.2. Public Chats

In addition to private messages, Tawasal also supports public channels and public groups. All public chats are cloud chats. Like everything on Tawasal, the data you post in public communities is encrypted, both in storage and in transit — but everything you post in public will be accessible to everyone.

3.2.3. Phone Number and Contacts

Tawasal uses phone numbers as unique identifiers so that it is easy for you to switch from SMS and other messaging apps and retain your social graph. We ask your permission before syncing your contacts.

We store your up-to-date contacts in order to notify you as soon as one of your contacts signs up for Tawasal and to properly display names in notifications. We only need the number and name (first and last) for this to work and store no other data about your contacts.

Our automatic algorithms can also use anonymized sets of phone numbers to calculate the average number of potential contacts an unregistered phone number may have on Tawasal. When you open the 'Invite friends' interface, we display the resulting statistics next to your contacts to give you an idea of who could benefit most from joining Tawasal.

You can always stop syncing contacts or delete them from our servers in Settings > Privacy & Security > Data Settings.

4. Keeping Your Personal Data Safe

4.1. Storing Data

Your data is stored in data centers. These are third-party provided data centers in which Tawasal rents a designated space. However, the servers and networks that sit inside these data centers and on which your personal data is stored are owned by Tawasal. As such, we do not share your personal data with such data centers. All data is stored heavily encrypted so that local Tawasal engineers or physical intruders cannot get access.

4.2. Retention

Unless stated otherwise in this Privacy Policy, the personal data that you provide us will only be stored for as long as it is necessary for us to fulfill our obligations in respect of the provision of the Services.

5. Processing Your Personal Data

5.1. Our Services

Tawasal is a cloud service. We will process your data to deliver your cloud chat history, including messages, media and files, to any devices of your choosing without a need for you to use third-party backups or cloud storage.

5.2. Safety and Security

To improve the security of your account, as well as to prevent spam, abuse, and other violations of our Terms of Service, we may collect metadata such as your IP address, devices and Tawasal apps you've used, history of username changes, etc.

5.3. Cross-Device Functionality

We may also store some aggregated metadata to create Tawasal features that work across all your devices.

5.4. Advanced features

We may use some aggregated data about how you use Tawasal to build useful features. For example, when you open the Search menu, Tawasal displays the people you are more likely to message in a box at the top of the screen. To do this, we calculate a rating that shows which people you message frequently. A similar rating is calculated for inline bots so that the app can suggest the bots you are most likely to use in the attachment menu (or when you start a new message with "@").

5.5. No Ads

Unlike other services, we don't use your data for ad targeting or other commercial purposes. Tawasal only stores the information it needs to function as a secure and feature-rich cloud service.

6. Bot Messages

6.1. Ecosystem

Tawasal has an API that allows third-party developers to create bots. Bots are apps that look like special Tawasal users: you can talk to them from your chat list, add them to groups or use a special "inline" interface to access their features. By performing any of these actions, you will be sending some of your data to the respective third-party bot developers.

6.2. How Bots Can Receive Data

You can send data to bot developers when you interact with their bots in one of these ways:

- By sending messages to a bot.
- By using an inline bot.
- By participating in a group with a bot.
- By pressing buttons in messages sent by a bot.

6.3. What Data Bots Receive

In any of the above cases, the developers of an automated user (bot) can get your public account data: your screen name, username and profile picture(s).

Bots can also receive the following data when you **interact** with them.

- Bots will obviously get your messages when you send them something.
- If you click on links or buttons provided by the bot, the bot can potentially get your IP address (provided that it controls the website to which the link leads).
- If the bot is a member of the same group with you, it may know you are a member.
- When you start your message with the username of an inline bot the interface transforms so that everything you type becomes a query to that bot. This query is sent to the bot so that it can provide its service.

6.4. Bots Are Not Maintained by Tawasal

Other than our own bots, no other bots or third-party bot developers are affiliated with Tawasal. They are completely independent from us. They should ask you for your permission before they access your data or you make it available to them.

7. Who Your Personal Data May Be Shared With

7.1. Other Tawasal Users

Other users of our Services with whom you choose to communicate with and share certain information. Note that by choosing to communicate with such other users of Tawasal, you are instructing us to transfer your personal data, on your behalf, to those users in accordance with this Privacy Policy. We employ all appropriate technical and organizational measures (including encryption of your personal data) to ensure a level of security for your personal data that is appropriate to the risk.

7.2. Law Enforcement Authorities

If Tawasal receives a UAE court order, we may disclose your IP address and phone number to the relevant authorities. So far, this has never happened.

8. Your Rights Regarding the Personal Data You Provide to Us

8.1. Your Rights

Under applicable data protection legislation, in certain circumstances, you have rights concerning your personal data. You have a right to: (1) request a copy of all your personal data that we store and to transmit that copy to another data controller; (2) delete (see section 10 below) or amend your personal data; (3) restrict, or object to, the processing of your personal data; (4) correct any inaccurate or incomplete personal data we hold on you;

and (5) lodge a complaint with national data protection authorities regarding our processing of your personal data.

8.2. Data Settings

You can control how your data is used (e.g., delete synced contacts) in Settings > Privacy & Security > Data Settings (using one of our mobile apps).

Sadly, if you're generally not OK with Tawasal's modest requirements, it won't be possible for us to provide you with our Services. You can delete your Tawasal account by proceeding to the deactivation page.

9. Deleting data

9.1 Accounts

If you would like to delete your account, you can do this on the deactivation page. Deleting your account removes all messages, media, contacts and every other piece of data you store in the Tawasal cloud. This action must be confirmed via your Tawasal account and cannot be undone.

9.2. Messages

- In cloud chats, you can choose to delete a message for all participants within at least 48 hours after sending. Otherwise, deleting a message will delete it from your message history. This means that a copy will stay on the server as part of your partner's message history. As soon as your partner deletes it too, it's gone forever.

- Any party can choose to delete any messages in one-on-one chats, both sent and received, for both sides. There is no time limit. Any party can also opt to clear the entire chat history for both parties, in which case the apps will be instructed to remove all messages in that chat, however many of them are still retained by either of the participants.

- In supergroups and channels, deleting a message removes it for all participants. Note that deleted messages and original versions of edited messages from supergroups are stored for 48 hours after deletion in order to be shown in the admins log.

10. Changes to this Privacy Policy

We will review and may update this Privacy Policy from time to time. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on this page **www.tawasal.ae/privacy**. Please check our website frequently to see any updates or changes to our Privacy Policy.