

Privacy Policy – LOCALA MENA LLC-FZ

Last updated: July 30th, 2026

Locala Mena is developing an omnichannel digital advertising platform primarily aimed at major retail chains, restaurants, and car dealerships. The platform enables clients to evaluate point-of-sale performance in real time, identify local customers, generate in-store traffic, and measure return on investment. Locala Mena delivers targeted advertising to consumers during their use of mobile apps or websites accessed via mobile devices, participating in real-time bidding.

Locala Mena also provides a proprietary solution that allows clients to obtain detailed statistics on foot traffic in specific geographic areas—including physical points of sale—whether or not in connection with an advertising campaign. This Privacy Policy applies to the processing of personal data by Locala MENA LLC-FZ, a company registered in the United Arab Emirates ("Locala MENA", "we", "us") if you are located in the Middle East or North Africa ("MENA").

Locala MENA complies with the Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (UAE PDPL). We align our practices with the principles of transparency and consent as defined by major international frameworks (such as the IAB TCF) adapted to the MENA market requirements.

If you are located outside the MENA, please see the policies for

- For people located in the United States:
<https://asklocala.com/en/privacy-policy-advertising-us/>
- For people located in Canada:
<https://asklocala.com/en/privacy-policy-advertising-canada/>
- For people located in the United Kingdom:
<https://asklocala.com/en/privacy-policy-advertising-uk/>
- For people located in Singapore:
<https://asklocala.com/en/privacy-policy-advertising-singapore/>

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A. Who is the data controller?

The processing of personal data in connection with the services described above is carried out by LOCALA MENA LLC-FZ (hereafter “Locala Mena”), Limited Liability Company (Free Zone) registered under the number 107048, with its registered office Dubaï Media City Building 1 - Office 108, In Dubai, acting as the data controller.

B. Information we process

We process data about you that is associated with the mobile advertising identifier of your device. If you have given consent, our partners provide us with information collected via your mobile advertising identifier (such as IDFA for Apple or AAID for Android) when you use mobile apps or websites. Your consent is obtained by the publisher operating the websites and apps you use.

- Consent data: the “consent string” to verify that you authorize us to process your data.
- Indirect identification data: MAID (mobile advertising ID), IP address.
- Browsing data: information about the devices or browsers used (device types, operating systems, device language, screen sizes, device time and time zones, etc.) and information about ads viewed or clicked (e.g., impressions, clicks).
- Precise geolocation data: latitude/longitude of the device; we may associate this with specific zones/locations (e.g., around a client’s store) and infer the presence of

a user within those areas at a given time.

- Tracking tools: pixels or similar tools, used by us and our customers/partners if you consent.

This data does not directly identify you (we do not use your name, postal address, etc.).

In accordance with Article 1 of the UAE PDPL, we do not collect "Sensitive Personal Data" (such as religious beliefs, racial origin, or health data) for advertising purposes.

C. How do we use the information?

Under Articles 5 and 6 of the UAE PDPL, the primary legal basis for our processing of personal data for advertising purposes is Consent.

C.1 Dissemination of targeted or non-targeted advertisements

Processing name	Processing purpose	Legal basis	Retention
Delivery & targeting via Fusio DSP or third-party DSPs	Deliver targeted campaigns through RTB on our proprietary DSP or third-party DSPs per advertiser criteria.	Consent	13 months
Measure performance via Fusio DSP	Measure ad serving performance and produce reports (impressions, in-ad events, clicks).	Consent	13 months
Pre-bid filters (IAS, DoubleVerify) via Fusio DSP	Optimize using pre-auction filters (viewability, fraud risk, brand safety).	Consent	13 months
Media buying optimization algorithms	Adjust bids in real time based on publisher performance.	Consent	13 months
Capping via Fusio DSP	Set a maximum display frequency per MAID (IDFA/AAID).	Consent	60 days

Third-party audiences (Adsquare) via Fusio DSP	Use segments to decide on auction participation when the user matches the target.	Consent	13 months
Drive-to-store measurement (Adsquare) via Fusio DSP	Evaluate campaign impact on in-store visits with Adsquare.	Consent	13 months
Centroid detection algorithms	Use mobility data to detect suspicious/inconsistent coordinates (fraudulent lat/long).	Legitimate interest	3 months

C.2 Audience creation

Processing name	Processing purpose	Legal basis	Retention	
Custom audience creation	Create segments (groups of users with common characteristics) for ad targeting.	Consent	Daily computation on a rolling 30-day window	
Integrate custom audiences into Fusio DSP	Build audience segments based on information provided by our customers.	Consent	13 months	
Retargeting via Fusio DSP	Build segments based on prior exposure or clicks recorded in past campaigns managed via Fusio DSP.	Consent	13 months	

C.3 Measurement of in-store visits

Processing name	Processing purpose	Legal basis	Retention	

Drive-to-store measurement (Locala)	Evaluate the impact of campaigns on physical in-store visits using Locala tooling.	Consent	13 months
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C.4 Trend analysis

Processing name	Processing purpose	Legal basis	Retention
Trend analysis via planning platform	Provide studies using mobility data flows (trend reports, media strategies, target audience descriptions).	Consent	Raw data: 120 days

C.5 Selection of premium advertising inventories

Processing name	Processing purpose	Legal basis	Retention
Curated Deal	Curate inventory by publishers, geotargeting and/or custom audiences to maximize performance.	Consent	13 months

C.6 Compliance with our legal obligations

Processing name	Processing purpose	Legal basis	Retention
Manage rights requests	Handle requests to exercise data protection rights and maintain an opt-out list.	Legal obligation	5 years from closure of the request
Manage opt-out list	Maintain a list of MAIDs that object to processing.	Legal obligation	Until the opt-out is withdrawn
Verify consent string validity	Ensure processing is activated only where prior consent exists.	Legal obligation	13 months (Fusio DSP) max 120 days (mobility data)

The retention periods above do not preclude the exercise of the rights in Section E, insofar as they can be legally exercised.

D. Information sharing

D.1. Data recipients

Locala Mena may give access to your data to the following categories:

- Locala Mena staff who process your data as part of their duties;
- Locala Group Entities, including subsidiaries and affiliates;
- Partners and service providers, including performance measurement providers;
- SSP platforms involved in RTB processes;
- Clients (advertisers or media agencies) acting as independent controllers under their own privacy policies;
- Authorized third parties under law/regulation, and our advisors;
- In corporate transactions (e.g., merger/acquisition), potential buyers/investors under contract.

D.2. International transfers

As an international group, data may be transferred outside the UAE. In such cases, Locala MENA ensures compliance with Articles 22 and 23 of the UAE PDPL, ensuring that the receiving jurisdiction provides an "adequate level of protection" or that "appropriate safeguards" (such as standard contractual clauses) are in place. Some hosting servers are in the United States. Our host is Amazon Web Services (AWS), certified under the Data Privacy Framework (DPF).

If we engage other processors/partners outside the Mena region, we will do so only after adopting appropriate measures to ensure an equivalent level of protection and security.

For questions, see [I. Contact us](#).

E. Your rights

E.1. User rights under applicable regulations

You may exercise the following rights by contacting us via the details in [I. Contact us](#):

- Access: obtain free access, a copy of your data, and information on processing.
- Rectification: request correction of your personal data.
- Restriction: request restriction where (i) you contest accuracy (for verification time); (ii) processing is unlawful and you oppose erasure; (iii) processing is unnecessary for us but you need the data for legal claims; (iv) you object (pending verification of overriding grounds).
- Withdrawal of consent: where processing is based on consent, you may withdraw it at any time.
- Objection: object to processing based on our legitimate interests for reasons relating to your particular situation (subject to compelling legitimate grounds or legal claims).
- Portability: for data processed based on contract performance.
- Deletion/erasure: where (i) processing is no longer necessary; (ii) you withdraw consent or object; (iii) data were unlawfully processed; (iv) erasure is required by law.

To facilitate handling, please state *“Exercise of rights relating to my personal data”* in the subject line.

We will respond within one (1) month of receipt. If your request is imprecise or incomplete, we may ask for additional information.

E.2 Behavioral advertising & mobile advertising identifier

We use information to help our customers deliver advertising that is of interest to users (targeted advertising).

To learn more or opt out of certain third-party behavioral advertising, visit digitaladvertisingalliance.org.

Mobile advertising identifiers are unique to devices (e.g., AAID for Android; IDFA/IFA for Apple).

Manage preferences:

- iOS: Settings → Privacy & Security → Apple Advertising → disable “Personalized Advertising”.
To manage app data access, see Apple’s “Manage sharing and access”.
- Android: Settings → Google → Ads → “Delete ad ID”. To manage app data access, adjust app permissions (Google Support).

Following these steps will stop partners from collecting data via your mobile advertising ID and stop our ads from being displayed on your mobile device. You can also contact us via [this form](#) or the details in [I. Contact us](#) to withdraw consent you previously gave. To locate your device ID:

- Android: Settings → Google → Ads (see your device's ad ID).
- iOS: ID is no longer shown natively; use a third-party app (e.g., "My Device ID by AppsFlyer").

F. Adherence to the IAB Europe Transparency & Consent Framework (TCF)

Locala Mena is a member of IAB Europe's TCF and complies with its specifications and policies. In line with TCF

principles, we automatically collect information about mobile devices, subject to prior end-user consent in the EU.

That consent is collected by partner publishers and transmitted to us as a "consent string", per TCF standards.

Locala Mena is identified under number 119 within the TCF.

G. Specific provisions applying to residents of California (USA)

- Rights under the CCPA: request access and details on practices; request deletion; opt out of "sale" of personal data; no discrimination for exercising rights.
- Disclosure duties: categories collected; business/commercial purposes; sources; categories disclosed/sold in the past 12 months; categories of third parties (as described in this Policy).
- Deletion: the ability to request deletion of personal data.
- Non-discrimination: we do not discriminate for exercising privacy rights.
- "Sales" of data: Locala Mena does not sell your personal data. Where we act as a service provider for publishers, purposes are limited accordingly; publishers inform us of that status.

H. Changes to this Policy

We may modify this Policy. We will inform you of material changes; we nevertheless invite you to review it regularly.

I. Contact us

Locala Mena has a Data Protection Officer (DPO). For questions about this Policy, contact us:

- Email: privacy@asklocala.com
- Post: LOCALA – Attn: DPO, 32 boulevard haussmann, 75009 Paris, FRANCE.