



# Privacy Policy

Effective: June 2026 • Version 1.0 • UAE PDPL Compliant

**Your privacy matters to us.** This Policy explains what personal data wrap2move collects, why we collect it, how we protect it, and the rights you hold under Federal Decree-Law No. 45 of 2021 (UAE Personal Data Protection Law). We recommend reading Section 4 in particular – it covers our WhatsApp channel in full detail.

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## 1. WHO WE ARE

- 1.1 **wrap2move** operates as a professional packers and movers business based in Dubai, UAE. We are the Data Controller for all personal data collected through our services, website (wrap2move.ae), and WhatsApp Business channel.
- 1.2 Contact for all data-related queries: **info@wrap2move.ae** or WhatsApp **+971 54 797 3900**. Mark your message: "Privacy – Data Request."
- 1.3 This Policy is effective **June 2026** and is issued in compliance with **Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (PDPL)** and its Implementing Regulations (Cabinet Resolution No. 33 of 2022).

## 2. WHAT PERSONAL DATA WE COLLECT

- 2.1 **Identity & Contact:** Your full name, mobile number, WhatsApp number, email address, and WhatsApp display name and profile photo (received automatically when you message us).
- 2.2 **Address & Location:** Your origin and destination addresses — including building name, unit number, floor, and community. This is some of the most sensitive data we hold; we treat it accordingly.
- 2.3 **Booking & Job Data:** Move date, service type, item inventory, access details, floor levels, lift availability, special handling requirements, and crew assignment records.
- 2.4 **Payment Data:** Quoted amount, payment confirmations, bank transfer references. We do **not** collect or store card numbers, PINs, or bank account credentials. Payments are by cash or direct transfer only.
- 2.5 **Communications:** All messages, voice notes, images, and documents exchanged via WhatsApp, email, or phone — before, during, and after your move.
- 2.6 **Move Photography:** Photographs of your Goods taken by our crew before loading (pre-move condition record) and at delivery. These images may incidentally show areas of your home or office and personal belongings.
- 2.7 **Identity Documents:** Where building management requires it for entry permits, we may temporarily hold a copy of an Emirates ID or passport page. This is deleted within 30 days of the move.
- 2.8 **Website Data:** IP address, browser type, device, pages visited, and time on site — collected automatically via cookies when you visit wrap2move.ae.
- 2.9 We do not seek to collect health, religious, or other sensitive personal data. If you voluntarily share health or mobility information when booking a senior/accessibility move, we use it solely to serve you safely and treat it with heightened protection.

## 3. WHY WE USE YOUR DATA & LEGAL BASIS

Purpose	Legal Basis (UAE PDPL Art. 8)	Data Used
Delivering the booked moving or storage service	Contract performance	Identity, Address, Booking
Issuing quotes, invoices & collecting payment	Contract performance	Identity, Financial
Pre-move condition photography of Goods	Legitimate interests (dispute evidence)	Visual / Photos
Coordinating entry permits with building management	Contract performance; Legal obligation	Identity, Address, ID docs
Real-time move tracking	Contract performance	Booking, Location
Customer service communications	Contract performance	Identity, Communications
VAT-compliant financial record keeping (5-year requirement)	Legal obligation — UAE VAT Law No. 8 of 2017	Financial, Transaction
Fraud prevention & dispute resolution	Legitimate interests	All relevant data
Responding to legal or regulatory demands	Legal obligation	All relevant data
Marketing messages via WhatsApp or email	Consent only — opt-out anytime by replying STOP	Identity, Contact
Website analytics & performance	Legitimate interests; Consent (non-essential cookies)	Technical / Website

#### 4. WHATSAPP BUSINESS & OUR WHATSAPP BSP — FULL DISCLOSURE

**This section is important.** WhatsApp is our primary customer channel. It involves multiple data processors (our WhatsApp BSP and Meta) and cross-border data flows. Read this section carefully so you understand exactly how your WhatsApp data is handled.

- 4.1 **Platform:** Our WhatsApp Business number (+971 54 797 3900) operates via the **WhatsApp Business API** provided through an authorised WhatsApp Business Solution Provider (BSP). All messages you send to our number are routed through the BSP's platform before reaching our team.
- 4.2 **What our WhatsApp BSP processes:** Your phone number, display name, message content (text, images, voice notes, documents), message timestamps, and delivery and read receipt status. Our WhatsApp BSP acts as our **Data Processor** under the UAE PDPL, processing this data solely on our instructions. We require our WhatsApp BSP to maintain appropriate data protection standards consistent with our obligations under the PDPL. You may review our WhatsApp BSP's own privacy terms at their website.
- 4.3 **What Meta processes:** WhatsApp's infrastructure is operated by **Meta Platforms, Inc.** (United States), with data processed on servers primarily in the **United States and Ireland**. By using WhatsApp, you are also subject to **Meta's WhatsApp Privacy Policy** ([whatsapp.com/legal/privacy-policy](https://www.whatsapp.com/legal/privacy-policy)), which governs Meta's own processing of your data at the platform level. This is outside our control.
- 4.4 **Two types of WhatsApp messages — different rules apply:**
  - (a) **Service messages** — replies to messages you send us, within 24 hours of your last message. No separate opt-in required. These are responses to your enquiry.
  - (b) **Template / outbound messages** — messages we initiate (booking confirmations, move-day reminders, promotional offers). These require your **prior explicit consent** before we can send them. We obtain this consent at the time of booking. You may withdraw consent at any time by replying **STOP**.
- 4.5 **Marketing messages via WhatsApp:** We will only send promotional or marketing messages to customers who have explicitly opted in. In compliance with **Cabinet Resolution No. 23 of 2020** (UAE TRA Commercial Communications Code), we do not send unsolicited commercial messages. Every marketing message includes a clear opt-out instruction. Opt-out requests are actioned within 24 hours.
- 4.6 **WhatsApp profile data:** When you message us, WhatsApp automatically makes your display name, phone number, and profile photo visible to us. We do not copy, store separately, or share your profile photo. Your display name and number are stored as part of your contact record for service delivery purposes.
- 4.7 **First message:** When you first contact us on WhatsApp, our automated welcome message includes a reference to this Privacy Policy so you are informed before we begin exchanging data.
- 4.8 **Retention:** WhatsApp conversation records are retained for **two (2) years** from your last message, after which they are permanently deleted.
- 4.9 **International transfer safeguard:** The transfer of WhatsApp data to Meta's servers in the US and Ireland is necessary for the performance of our contract with you (your chosen communication channel) and is covered under Article 26(2)(b) of the UAE PDPL.

## 5. WHO WE SHARE YOUR DATA WITH

- 5.1 We do not sell, rent, or trade your personal data. We share it only as follows:
- 5.2 **Service subcontractors** – vetted third-party crews or specialist handlers (piano, safe, pool table) receive only the data needed for that job: your name, service address, move date, and handling instructions. They are contractually bound to confidentiality.
- 5.3 **Building management & community authorities** – to obtain Entry Permits and NOCs. Only your name, move date, and vehicle details are shared unless the authority specifically requires more.
- 5.4 **Technology processors** – platforms that process data on our behalf under our instructions:
- **our WhatsApp BSP** (WhatsApp Business API) – UAE / global
  - **Meta Platforms / WhatsApp** – US & Ireland
  - **Supabase Inc.** (move tracking database) – AWS infrastructure, global
  - **Hostinger** (website hosting) – EU / global
  - **Google LLC** (Maps, Analytics) – US-based, Standard Contractual Clauses apply
- 5.5 **Legal & regulatory authorities** – Dubai Police, UAE courts, regulatory bodies, or the UAE Data Office where required by law or valid court order.
- 5.6 **Professional advisors** – lawyers, accountants, auditors – under strict confidentiality, and only to the minimum extent necessary.

## 6. HOW LONG WE KEEP YOUR DATA

Data	Kept For	Reason
Customer identity & contact	5 years from last transaction	UAE VAT Law; civil claims window
Booking records & invoices	5 years from move date	UAE VAT Law (mandatory)
Pre-move & delivery photos	12 months from move date	Claims & dispute window
WhatsApp & email conversations	2 years from last message	Service history & dispute evidence
Identity document copies (Emirates ID / passport)	Deleted within 30 days of move	Data minimisation
Marketing consent records	Until withdrawn + 1 year	PDPL consent audit trail
Website analytics	13 months	Standard analytics cycle
CCTV footage (storage facilities)	30 days (unless incident)	Security; proportionality

- 6.1 When the retention period expires, data is securely and permanently deleted or irreversibly anonymised.

## 7. YOUR RIGHTS UNDER UAE PDPL

**Federal Decree–Law No. 45 of 2021** gives you the following rights. Submit requests to [info@wrap2move.ae](mailto:info@wrap2move.ae) – marked "Privacy – Data Request." We will respond within **30 days**.

- 7.1 **Access:** Request a copy of the personal data we hold about you.
- 7.2 **Correction:** Request that inaccurate or outdated data be corrected.
- 7.3 **Erasure:** Request deletion of your data where it is no longer needed, where you withdraw consent, or where it has been unlawfully processed – subject to our legal obligation to retain certain records (e.g., VAT records for 5 years).
- 7.4 **Portability:** Receive your data in a structured, machine-readable format where processing is based on contract or consent.
- 7.5 **Object:** Object to processing based on legitimate interests, or to direct marketing (actioned immediately).
- 7.6 **Withdraw consent:** Where processing relies on your consent, you may withdraw it at any time – reply **STOP** on WhatsApp or email us. Withdrawal does not affect prior lawful processing.
- 7.7 Exercising any right is **free of charge**. We may ask you to verify your identity before acting on a request to protect against unauthorised disclosure.

## 8. DATA SECURITY

- 8.1 We implement technical and organisational measures to protect your data against unauthorised access, loss, or misuse. These include: access controls limited to authorised personnel on a need-to-know basis; encrypted connections (HTTPS/TLS) for all cloud-based systems; contractual confidentiality obligations on all subcontractors; and secure deletion of data at the end of retention periods.
- 8.2 **Data breaches:** If a breach occurs that poses a risk to your rights, we will notify the **UAE Data Office within 72 hours** and notify you directly without undue delay, as required under the PDPL.

## 9. COOKIES

- 9.1 wrap2move.ae uses cookies. **Strictly necessary cookies** run the site and cannot be disabled. **Analytics cookies** (e.g., Google Analytics) are set only with your consent via the cookie banner on your first visit. You can update cookie preferences at any time via the Cookie Settings link in the website footer, or by adjusting your browser settings.
- 9.2 We do not use cookies for targeted advertising and do not share cookie data with ad networks or data brokers.

## 10. CHILDREN

- 10.1 Our services are contracted by adults only. We do not knowingly collect personal data from anyone under 18. If we discover we have done so inadvertently, we will delete it promptly. Contact us at [info@wrap2move.ae](mailto:info@wrap2move.ae) if you believe a child's data has been submitted.

## 11. COMPLAINTS & UAE DATA OFFICE

- 11.1 If you have concerns about how we handle your data, please contact us first at [info@wrap2move.ae](mailto:info@wrap2move.ae) – we aim to resolve all issues promptly and directly.
- 11.2 If you are not satisfied with our response, you have the right to complain to the **UAE Data Office** (supervisory authority under the PDPL):
  - **Website:** [udpo.gov.ae](http://udpo.gov.ae)
  - **Email:** [dpo@udpo.gov.ae](mailto:dpo@udpo.gov.ae)

## 12. CHANGES TO THIS POLICY

- 12.1 We may update this Policy from time to time. The latest version is always at [wrap2move.ae/privacy](https://wrap2move.ae/privacy). For material changes that significantly affect your rights, we will notify existing customers via WhatsApp or email at least 14 days before the change takes effect.
- 12.2 This Policy is governed by the laws of the UAE, principally **Federal Decree-Law No. 45 of 2021 (PDPL)**. Any disputes are subject to the jurisdiction of the courts of Dubai.

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**wrap2move**

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