



Privacy Policy

How Mallah Company and its group companies collect, use and protect personal data

MALLAH COMPANY

ISSUED BY	Mallah Company (Lemallah) A family-owned group of businesses operating in Syria since 1970 · Offices in Aleppo and Damascus
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CLASSIFICATION	Shareable with clients and business partners

Document Control

Title	Privacy Policy
Issued by	Mallah Company (Lemallah)
Document no. / version	MC-POL-002 · v1.0
Owner	Legal Department Manager
Applies to	Personal data of customers, passengers, travellers, venue visitors, client staff, website visitors, employees, drivers, job applicants and suppliers of every group company; binding on all staff, drivers, subcontractors and suppliers who handle it
Approved / next review	September 2026 / September 2027 (reviewed at least annually)
Classification	Shareable with clients and business partners
Basis	Extends to the whole group the confidentiality standards applied under the group's contracts with UN agencies, international NGOs and international companies and TaxiTel's Privacy Policy (TT-POL-002)

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SECTION 01

1 Introduction and Our Commitment

PRIVACY AT MALLAH COMPANY

Every day, Mallah Company's businesses serve people who trust us with information about themselves: staff of United Nations agencies and international NGOs, business partners, passengers and travellers, families who visit our venues, and the people who work for us. We treat that information with the same care we apply to the service itself.

This Privacy Policy explains what personal data the group collects, why we collect it, how we protect it, who we share it with, how long we keep it, and the rights people have over their data. It brings together, in one written document for the whole group, the confidentiality standards our companies already work under in their contracts with United Nations agencies, international NGOs and other partners, and in TaxiTel's Privacy Policy (TT-POL-002).

Privacy at a glance

- We collect only the data we need to provide our services and to run our businesses.
- We never sell personal data, and we do not use it for advertising profiles.
- Client, passenger and traveller details – who they are, where they go and when – are confidential. Our staff may not disclose them.
- Access to our systems is restricted by role, so staff see only what their job requires.
- You can ask to see, correct or delete your data at any time by contacting us (Section 19).

SECTION 02

2 Who We Are

Mallah Company (Lemallah) is a family-owned group of businesses operating in Syria since 1970, with offices in Aleppo and Damascus. The group companies are TaxiTel, Node Trade, Node Construction, Node Multiservice, Monoland, Mallah for Travel and Adams Jeans. The group company you deal with – for example TaxiTel when you book transport, or Mallah for Travel when you book a hotel – is responsible for your personal data (the data controller) for that service, and Mallah Company is responsible for data handled at group level, such as through lemallah.com.

When a group company provides goods or services under a contract with a client organisation, that organisation may also be a controller of its own staff's data and may give us instructions on how to handle it. In that case we follow the client's instructions and the data-protection terms of the contract, in addition to this Policy.

The Legal Department Manager is responsible for this Policy and for data-protection matters across the group, including handling requests from individuals, advising staff, and managing any data breach. The Policy is approved by the Managing Director. Where a group company has its own privacy policy – such as TaxiTel's TT-POL-002 – both apply. Contact details are in Section 19.

SECTION 03

3 Scope

This Policy applies to personal data about:

- customers of every group company — including passengers, travellers and hotel guests booked through us, buyers of our goods, construction and technology clients, and families visiting Monoland;
- staff and representatives of client organisations, including UN agencies, NGOs and companies, who request, approve or use our services;
- visitors to our websites (including lemallah.com) and people who contact us by phone, WhatsApp, email or social media;
- employees, drivers, site workers and job applicants;
- suppliers, subcontractors, freelance providers and other business contacts.

It covers data handled by the group in Syria and in connection with cross-border travel, imports and international partnerships, in any form — electronic or paper. All owners, staff, drivers, subcontractors and suppliers who handle personal data on the group's behalf must follow it.

SECTION 04

4 Personal Data We Collect

CATEGORY	EXAMPLES
Identity and contact data	Name, phone number, email address, organisation and job title; passport or ID details only where required, for example for cross-border travel, hotel registration or official contracts.
Booking and service data	Trip and travel details, hotel bookings, delivery addresses, orders, project and site details, venue visits and tickets, and any special requests.
Billing data	Contract and invoice details, prices, payment records and the contact details of billing staff at client organisations. We do not store payment-card numbers.
Communications	Messages and calls with our offices, inquiry and quote requests, feedback and complaints.
Website data	Information you enter in our inquiry forms, and basic technical data (such as IP address and browser type) that is necessarily processed when a web page is delivered.
Employee and driver data	Identity and contact details, driving licences and qualifications, employment records, schedules, attendance and leave, pay and cash advances, training and conduct records.
Operational data	Vehicle usage, fuel and maintenance records, site attendance, stock movements and similar records, which may be linked to the person responsible.

CATEGORY	EXAMPLES
Images and CCTV	Where cameras are used at our premises or venues, recordings of people in those areas, used for safety and security.
Supplier data	Names and contact details of suppliers, subcontractors and freelance providers, ownership and company documents, and the results of sanctions screening.

SECTION 05

5 How We Collect Personal Data

- **Directly from you** – when you book a service, place an order, visit a venue, request a quote, call or message us, apply for a job, or sign a contract with us.
- **From client organisations** – when an organisation books services for its staff or visitors and gives us their names, contact details and itineraries.
- **During the service** – when our staff record trips, deliveries, work performed, times and incidents.
- **From our own systems** – our management systems record bookings, fleet and stock movements, projects, fuel, maintenance and invoicing.
- **From public or official sources** – for example, sanctions lists used to screen suppliers and partners.

SECTION 06

6 Why We Use Personal Data and Our Legal Basis

PURPOSE	LEGAL BASIS
Delivering our services and goods – transport, travel and hotel bookings, deliveries, construction and technology projects, venue services – and contacting customers about them	Performance of a contract; legitimate interest in delivering a safe, reliable service
Invoicing, collecting payment and keeping accounting records	Performance of a contract; legal obligation
Reporting to client organisations as agreed in their contracts	Performance of a contract
Safety and security of customers, visitors and staff, and responding to accidents and incidents	Legitimate interest; protection of vital interests in emergencies
Managing employees and drivers: payroll, attendance, leave, training and conduct	Employment contract; legal obligation

PURPOSE	LEGAL BASIS
Answering inquiries, quote requests and complaints	Legitimate interest; steps taken at your request before a contract
Screening suppliers and partners against sanctions lists; preventing fraud and corruption	Legal obligation; legitimate interest
Complying with laws, court orders and requests from competent authorities	Legal obligation
Sending service updates or offers by message or email	Consent, which you can withdraw at any time

SECTION 07

7 Travel, Location and Movement Data

Information about where people travel, stay and live is sensitive, so we apply extra care to it:

- We use pickup points, destinations, itineraries, hotel bookings and delivery addresses only to deliver the service, bill it, report it to the client under contract, and handle safety incidents.
- The travel and movement details of client organisations and their staff are treated as confidential. Staff may not discuss who they served, where or when, with anyone outside their work.
- If we use vehicle location technology, it is used for dispatch, safety, fleet management and billing accuracy – not to monitor staff or customers for any unrelated purpose.
- We do not share location or travel data with third parties for marketing, and we never sell it.

SECTION 08

8 Sharing Personal Data

We share personal data only where necessary, and only with:

- **The people delivering your service** – for example the assigned driver, the hotel you booked, or the team carrying out your project – only the information they need.
- **Other group companies** – where needed to provide a service you asked for or to run shared functions such as finance and administration, under this Policy.
- **Client organisations** – records and reports about services provided to their staff, as required by their contracts.
- **Service providers** who support our operations, such as hosting and database providers, email and messaging services, and IT support. They may use the data only to provide their service to us.
- **Business partners** with whom we operate a joint or licensed service, where necessary for that service and under written terms that protect the data.
- **Authorities** – police, courts, customs, border and other competent authorities, only where required by law or needed to protect someone's safety.

- **Professional advisers and auditors** — including clients and donors exercising contractual audit rights.

What we never do

We do not sell personal data, rent it, or share it with third parties for their own marketing.

SECTION 09

9 International Transfers

Some of the technology services we use, such as cloud hosting, email and messaging platforms, may store or process data on servers outside Syria. Our clients, suppliers, hotels and business partners may also be based outside Syria. When personal data is transferred abroad, we:

- use established providers that apply recognised security standards;
- transfer only the data needed for the purpose;
- follow any transfer requirements in our clients' and partners' contracts, including the use of appropriate contractual safeguards where required.

SECTION 10

10 How We Protect Personal Data

- **Role-based access** — our systems give each staff member access only to the data their role requires. Financial and pricing data is restricted to authorised administrators.
- **Individual accounts** — staff use personal logins; accounts are removed when someone leaves the company.
- **Confidentiality** — every employee and driver is bound by confidentiality rules. Staff may not photograph customers or visitors, post about them on social media, or disclose their details without permission.
- **Paper records** — contracts, forms and documents are kept in secured offices and shared only with authorised staff.
- **Suppliers** — providers who handle personal data for us must protect it and use it only on our instructions.
- **Minimisation** — we collect only what we need, and we avoid collecting sensitive data, such as health or religious information, unless it is genuinely needed and provided voluntarily (for example, a mobility-assistance request or a child's allergy at a venue).

SECTION 11

11 Data Breaches

If personal data is lost, disclosed or accessed without authorisation, the group will act promptly to contain the incident, assess the risk and prevent it from happening again. We will inform affected client organisations and business partners within any period set in their contracts, and inform affected individuals where the breach is likely to put them at risk. Staff must report any suspected breach — such as

a lost phone containing customer details — to their manager and to the Legal Department Manager immediately.

SECTION 12

12 How Long We Keep Personal Data

TYPE OF DATA	RETENTION PERIOD
Accounting, invoicing and contract records	5 years, or longer where a client contract or the law requires
Booking, service and delivery records	5 years, as part of accounting and client reporting records
Employee and driver records	For the duration of employment and up to 5 years afterwards
Unsuccessful job applications	Up to 12 months
Inquiries and quote requests that do not lead to business	Up to 24 months
Supplier and subcontractor records	For the duration of the relationship and up to 5 years afterwards
CCTV recordings, where used	Normally 30–90 days, unless needed for an incident or investigation

The full retention schedule is set out in our Records Management and Data Retention Policy (MC-POL-003). When data is no longer needed, it is securely deleted or anonymised. Data involved in a dispute, investigation or audit is kept until the matter is closed.

SECTION 13

13 Your Rights

Subject to applicable law, you may ask us to:

- access the personal data we hold about you and receive a copy;
- correct data that is inaccurate or incomplete;
- delete your data where we no longer have a valid reason to keep it;
- restrict or object to certain uses of your data, including direct messages about our services;
- withdraw your consent at any time, where we rely on consent.

We will respond within 30 days. We may need to confirm your identity first. Some requests may be limited where we must keep data to meet a legal or contractual obligation — for example, invoices already issued to a client. If you were served under a client organisation's booking, we may coordinate our response with that organisation.

SECTION 14

14 Children

Most of our services are booked by adults and organisations. Where children use our services — for example when they travel with their families or visit Monoland — we process only the minimum information needed, and we deal with the parent, guardian or organisation responsible for them. We do not photograph or film children at our venues for promotional use without the written permission of a parent or guardian.

SECTION 15

15 Our Websites

Our group website, lemallah.com, is designed to collect as little data as possible:

- The inquiry form collects the details you choose to enter, such as your name, contact details, organisation and message. We use this only to answer your inquiry or route it to the right group company.
- The website does not use advertising or analytics tracking. Fonts may be loaded from Google Fonts, which means your browser's IP address is visible to Google when the page loads.
- Links to the websites and social media pages of group companies, such as taxitel.co, lead to pages governed by their own privacy policies.

If we add analytics or other tracking in the future, we will update this Policy first.

SECTION 16

16 Employee and Driver Data

We hold data about our employees and drivers to manage their employment: identity and contact details, licences and qualifications, schedules, attendance, leave, pay and cash advances, training, conduct records and assignments. This data is used only for employment, safety, legal and operational purposes, is accessible only to staff who need it, and is not shared outside the group except with service providers acting for us, clients where a contract requires staff details (for example, vetting of personnel assigned to a client), or authorities where the law requires. Employees and drivers have the rights described in Section 13.

SECTION 17

17 Responsibilities of Staff

Everyone in the group who handles personal data must:

- use it only for the job, never for personal purposes;
- keep customer, client and traveller details confidential — including who was served, where and when;
- never photograph, record or post about customers or visitors without their explicit permission;
- keep phones and devices that contain customer or client details locked, and report their loss immediately;

- share personal data only through company channels and only with people who need it;
- report any suspected breach or misuse to their manager or the Legal Department Manager.

A breach of these rules may lead to disciplinary action, up to and including dismissal.

SECTION 18

18 Changes to This Policy

The Legal Department Manager reviews this Policy at least once a year, and whenever our services, systems or legal requirements change. The current version is available on lemallah.com and from our offices on request. Significant changes will be communicated to our clients and business partners.

SECTION 19

19 Contact Us

Data-protection contact	The Legal Department Manager, Mallah Company
Email	mohamed@lemallah.com — marked "For the attention of the Legal Department Manager"
Offices	Aleppo: Ferqan, Express Building, Mallah Office · Damascus: Malki, River Street, Building 233, 3rd Floor
Website	lemallah.com

If you have a concern about how we handle your data, please contact us first — we will do our best to resolve it.