Holdwell

Privacy Policy

Last updated: 10 November 2026

This policy explains how Alsana Management LLC-FZ, trading as Holdwell ("we", "us"), handles your personal information when you visit our product pages, see our ads or buy from us. Contact: info@alsanamanagement.com.

What we collect

- **Purchase details:** your name, email address, country, what you bought and when. Payments are processed by Whop; we do not receive your full card details.
- **Messages:** anything you send us, such as support emails.
- **Advertising and analytics data:** when you view our ads or pages, our platform partners (Whop and Meta, which owns Facebook and Instagram) may use cookies, pixels and similar technology to record actions such as page visits and purchases, along with device and approximate location information. This helps us measure our ads and show them to people likely to be interested, including across devices and sites.

Why we use it

- To deliver your purchase and give you access (needed to perform our contract with you).
- To answer questions and handle support or refund requests (contract and legitimate interests).
- To measure and improve our advertising and pages (legitimate interests, or your consent where the law requires it, for example for non-essential cookies).
- To meet legal, tax and accounting obligations (legal obligation).

We do not sell your personal information. We will only send you marketing emails if you have agreed to receive them, and you can unsubscribe at any time.

Who we share it with

- **Whop**, which hosts our store, processes payments and delivers your download.
- **Meta and other advertising partners**, for ad measurement and targeting.
- **Service providers** we use to run the business, such as email and accounting tools.
- **Authorities**, where required by law.

These partners process data under their own privacy policies as well as ours.

International transfers. We are based in the United Arab Emirates and our partners may process data in other countries, including the United States. Where required, transfers are

protected by appropriate safeguards such as standard contractual clauses.

How long we keep it. Purchase records are kept for as long as needed for tax and accounting purposes (usually up to 7 years). Support messages are kept for up to 2 years. Advertising data is kept according to our partners' retention periods.

Your rights. Depending on where you live (for example under UK or EU GDPR, or California law), you may have the right to access, correct or delete your information, object to or restrict how we use it, withdraw consent, opt out of targeted advertising, and receive a copy of your data. To make a request, email info@alsanamanagement.com. You can also complain to your local data protection authority, such as the ICO in the UK.

Ad choices. You can control ad personalisation in your Facebook and Instagram ad settings, and block or delete cookies in your browser.

Children. Our products are not intended for anyone under 18, and we do not knowingly collect their information.

Changes. We may update this policy and will change the "last updated" date when we do.