



Privacy Policy

Last updated: 5 October 2026

This Policy explains how NOVA STAR REAL ESTATE L.L.C handles personal data in connection with novastarestate.ae, why it is used and how individuals can exercise their rights.

1. Company and applicable law

The controller is NOVA STAR REAL ESTATE L.L.C, United Arab Emirates, Licence No. 1457205. Contact for personal data matters: info@novastarestate.ae. Registered address: RIGGA BUSINESS CENTRE-308-28, Al Murqabat, Al Murqabat, Dubai, Dubai, United Arab Emirates.

This Policy covers both language versions of the Website. Applicable provisions of UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (PDPL) and its implementing instruments govern processing. Russian Federal Law No. 152-FZ of 27 July 2006 applies within its statutory scope, including processing of Russian citizens' data by a foreign company on the basis of a contract, another agreement or consent. Interface language or a Russian citizen's presence outside Russia does not by itself exclude that law.

This Policy is a notice. Browsing, reading this Policy or continuing to use the Website does not constitute consent to all processing. Consent is requested separately where required.

2. Data processed

Enquiries: name, telephone number, preferred contact channel, Telegram username, email address when supplied, correspondence, property preferences and answers to selection questions. Only fields identified as required in the relevant form are mandatory. Please do not supply another person's data without appropriate authority.

Technical information may include IP address, device and browser details, request date and time, page address, referral source, technical logs and cookie identifiers. Analytics data depends on the user's separate choices and the services actually enabled.

Consent evidence includes the enquiry identifier, time, source, consent wording version, permissions selected and the minimum technical information needed to demonstrate the action.

Website forms are not intended for passports, payment documents, health information, biometric or other sensitive data. Transaction and AML/KYC documents are requested separately with information about purposes, grounds, recipients and retention. Services are intended for adults. If a child's data is identified, we restrict processing and determine the lawful next steps.

3. Purposes and legal grounds

Enquiries and property selection: responding to a specific request, arranging contact, preparing proposals and organising viewings, using contact details, preferences and correspondence. The basis is separate consent or an applicable basis for steps requested before a contract.

Contracts and mandatory checks: entering into and performing agreements and meeting applicable real estate and AML/KYC duties. Necessary data is processed on the relevant contractual or statutory ground. This Policy does not replace a separate notice when transaction documents are collected.

Website operation and security: delivering requested pages, preventing abuse and diagnosing faults. Only necessary technical information is processed on an identified lawful basis; consent is obtained first where required.

Analytics and advertising: optional analytics starts after the user's separate choice. Promotional messages require separate prior consent, which is not a condition for an enquiry response. A reply about a requested consultation does not authorise future advertising.

We do not treat "legitimate interests" as a general PDPL legal basis. Processing without consent requires a specific applicable exception, such as contractual necessity or a statutory obligation.

4. Processing methods

Processing may include collection, recording, organisation, accumulation, storage, correction, retrieval, use, permitted disclosure and access, restriction, deletion, destruction and anonymisation, by automated and manual means. Operations are limited to their relevant purpose.

Information about profiling or solely automated decisions with legal or similarly significant effects is provided before such processing starts. Individuals can challenge decisions and request human involvement where the law provides these rights.

5. Recipients and services

Access is limited to authorised staff and necessary hosting, email, CRM, communications and technical support providers. Processing arrangements define purposes, operations, confidentiality, security, deletion and incident cooperation requirements.

Data may be disclosed to a developer, owner or property manager for a particular viewing or transaction requested by the user where a lawful basis exists. We provide necessary recipient information and obtain additional consent when required. Disclosures to authorities occur where provided by law.

We do not sell personal data or disclose it for third parties' independent marketing without a separate lawful basis. Information about providers, their roles, processing countries and categories of disclosed data is available on request at info@novastarestate.ae. Information required for valid consent is provided before consent is given.

6. Processing locations and international transfers

The Company is based in the UAE. The Website, enquiry database and amoCRM instance are hosted in the UAE; enquiry data is made available to Company staff in the UAE. Information about providers' processing countries, including backup storage and remote access, may be requested at info@novastarestate.ae.

Where Russian citizens' data is collected, Article 18(5) of Law No. 152-FZ restricts the specified collection-related operations using databases outside Russia, except for statutory exceptions. Ordinary consent to transfer data to the UAE does not waive this requirement.

Subsequent cross-border transfers are assessed separately from localisation. Where Law No. 152-FZ applies, Article 12 requires necessary prior Roskomnadzor notifications, recipient assessments, restrictions and waiting periods. Transfers out of the UAE require a permitted mechanism under PDPL Articles 22–23 and applicable implementing rules.

This Policy does not authorise transfers to unspecified countries. Where consent is the ground for a particular transfer, the country, recipient, purpose, data involved and other required information are disclosed before consent is obtained.

7. Cookies and external resources

Essential cookies are limited to requested functions, with the processing basis assessed as applicable. Optional analytics and advertising identifiers, pixels and similar technologies must not start before necessary consent. Declining optional analytics does not prevent an enquiry.

Settings must allow acceptance or rejection of optional categories and subsequent changes. The cookie and service list must disclose purpose, provider, duration and processing countries. Browser deletion controls do not replace withdrawal through Website settings.

The Website links to Marquiz, WhatsApp, Telegram and social networks. Following a link opens a third-party resource with its own terms. If we receive enquiry data from a quiz or messenger, we remain responsible for our own processing. A link to another provider's policy does not remove our obligations.

8. Retention and deletion

Enquiry data is retained until the enquiry purpose is met or consent is withdrawn, unless another lawful basis applies. Separate enquiry consent sets a maximum of three years from the date given; this is a ceiling, not a requirement to retain resolved enquiries. A new interaction does not automatically extend the earlier consent.

Contract, accounting and AML/KYC records follow specific applicable statutory retention periods, disclosed at the relevant collection stage. Ordinary enquiry consent does not permit indefinite retention of all information.

Technical logs, analytics, consent evidence and backups require a purpose-based retention schedule aligned with actual settings. Data must not be retained indefinitely for unspecified future use.

Once the purpose ends, data is deleted, destroyed or irreversibly anonymised unless further processing is legally permitted. Where Law No. 152-FZ applies, Article 21 deadlines include up to 30 days after purpose completion or withdrawal where no retention ground remains. Legally retained records are restricted from unrelated uses.

9. Security and incidents

We organise proportionate access controls, secure transmission, account, backup and update management, confidentiality obligations and provider oversight. This Policy is not a guarantee of absolute security.

We contain and investigate security incidents and meet applicable notification duties. Where Article 21(3.1) of Law No. 152-FZ applies, Roskomnadzor receives the incident notice within 24 hours and the internal investigation results within 72 hours of detection. PDPL notifications follow applicable statutory conditions and procedures.

10. Your rights and requests

Subject to applicable law, you may obtain processing information and access, request correction, erasure or restriction, object to direct marketing, withdraw consent, and exercise portability and automated-decision rights where provided by law.

Write to info@novastarestate.ae with the contact details used for your enquiry and your request. Proportionate identity or authority checks may be needed. Do not attach a passport copy to an ordinary initial request unless necessary.

Where Law No. 152-FZ applies, processing information and access are provided within 10 working days, extendable by up to 5 working days with a reasoned notice. Correction, cessation and deletion have their own statutory deadlines; a general 30-day response period does not apply to every request. PDPL requests follow the periods and procedures established by applicable rules, with shorter mandatory deadlines taking priority.

You may complain to Roskomnadzor for matters within Law No. 152-FZ, the competent UAE data protection authority for PDPL matters, or a court. This Policy does not limit statutory rights.

11. Withdrawal

Withdraw consent by emailing info@novastarestate.ae. Optional cookies can also be disabled through settings and advertising through the offered opt-out channel. Withdrawal does not affect prior lawful processing.

Processing based on that consent then stops. Where specific records must be retained on another lawful ground, their use is restricted to that purpose and the ground is explained. If an enquiry cannot be handled without necessary contact data, we inform the user.

12. Changes

Updated versions display their date. A Policy update does not automatically extend previously obtained consent. New purposes or other processing requiring consent are subject to fresh consent before processing starts.

13. Contact

NOVA STAR REAL ESTATE L.L.C • Licence No. 1457205.

Website: novastarestate.ae. Personal data and withdrawal: info@novastarestate.ae.