# Sila Sim — Privacy Policy

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This policy explains what personal data Sila Sim collects when you buy a travel eSIM from us, why we hold it, who we share it with and what you can ask us to do with it.

**Draft for legal review.** Square brackets mark facts only you can supply. Written against Kuwait's Personal Data Protection Law No. 26 of 2024 and CITRA's Data Privacy Protection Regulation; a Kuwaiti lawyer should review it before publication.

## 1. Who we are and what this covers

Sila Sim is a trading name of [legal entity name], commercial registration number [CR number], of [address], Kuwait. We are the data controller for the personal data described here.

This policy covers data we collect when you order from us on WhatsApp, visit our website at [domain], buy a plan, contact support, or buy through one of our agents.

We collect only what we need to sell you an eSIM and support it. We do not sell your personal data to anyone.

## 2. What we collect and why

| What | Why we need it | Our basis |
|---|---|---|
| Your WhatsApp number and display name | To take your order and send your eSIM | Performing our contract with you |
| Your name, and email if you give it | Receipts and support | Performing our contract |
| Destination, plan and dates | To supply the right plan | Performing our contract |
| eSIM identifiers (ICCID, and EID if you send it) | To install, activate and fix your eSIM | Performing our contract |
| How much data you have used, and on which day | To answer "how much is left?" and to investigate faults | Performing our contract |

| What | Why we need it | Our basis |
|---|---|---|
| Country of connection and connection times | Fault diagnosis and fraud prevention | Our legitimate interest in a working, honest service |
| Payment confirmation, amount, last four digits and reference | To confirm payment, issue refunds, keep accounts | Legal obligation and contract |
| Your support messages and any screenshots you send | To resolve your problem | Performing our contract |
| Identity documents, only if we must verify an unusual claim | Fraud prevention | Legal obligation and legitimate interest |

**We do not see what you browse.** We receive how much data was used and when, not which sites or apps you visited, what you typed, or the content of anything you sent.

We do not collect sensitive personal data, and you should not send it to us.

## 3. Ordering on WhatsApp

We sell and support through WhatsApp, so it is worth being clear about what that means.

WhatsApp is operated by Meta. Messages between you and us are end-to-end encrypted in transit, so Meta cannot read what we send each other. Meta does hold the fact that you messaged a business, when, and from which number, and it processes that under its own privacy terms, which we do not control.

We use the WhatsApp Business Platform. Your messages to us are stored on our systems so that we can see your order history and support history when you come back.

If you would rather not use WhatsApp, you can order and get support by email at [support email] instead.

## 4. Who we share your data with

We share the minimum needed, with these kinds of recipient:

- **Our connectivity providers**, who issue the eSIM profile and carry your data. They receive the eSIM identifiers and the plan, not your name or your messages.

- **Local mobile operators** in your destination, through those providers, as any roaming connection requires.
- **Our payment provider**, who processes your payment. They receive what they need to take the payment; we never see your full card number.
- **WhatsApp / Meta**, as section 3 describes.
- **Our agents**, where you bought through one. An agent sees your order, not your usage or your support history with us.
- **Professional advisers, accountants and auditors**, where they need it.
- **Authorities**, where Kuwaiti law or a valid order requires it.

We do not sell your data, and we do not share it with advertisers.

If our business is sold or merged, your data may transfer with it. We would tell you before that happened.

## 5. Sending data outside Kuwait

Travel connectivity cannot work without this. To give you an eSIM that functions abroad, data about your eSIM and your connection necessarily leaves Kuwait: it goes to our connectivity providers and to the operator in the country you are visiting.

Our providers are based in [the United Kingdom and Hong Kong], and your traffic may be routed through gateways in Europe or Asia. Your payment provider and WhatsApp also process data outside Kuwait.

Under Kuwait's Personal Data Protection Law we only transfer personal data abroad where the receiving country offers adequate protection, or under contractual safeguards with the recipient, or where the transfer is necessary to perform our contract with you. Supplying a working eSIM in your destination falls into that last category.

We keep written agreements with our providers covering confidentiality and security, and we send them the minimum data needed.

## 6. How long we keep things

| What | How long |
|---|---|
| Orders, invoices and payment records | [7] years, to meet accounting and tax rules in Kuwait |

| What | How long |
|---|---|
| Your WhatsApp conversation with us | [24] months after your last message |
| eSIM and usage records | [12] months after the plan expires |
| Security and fraud logs | [12] months |
| Identity documents, where we asked for them | [90] days after the matter is closed |
| Marketing consent, where you gave it | Until you withdraw it |

When a period ends we delete the data or make it anonymous, so that what remains cannot be traced back to you.

## 7. Your rights

You can ask us to:

- **give you a copy** of the personal data we hold about you
- **correct it** if it is wrong or out of date
- **delete it**, where we do not need it for a contract or a legal duty
- **stop or limit** how we use it
- **object** to use based on our legitimate interests
- **send it on**, to you or to another provider, in a usable format
- **withdraw your consent** at any time, where we relied on consent, such as marketing

Some data we must keep whatever you ask — invoices, for example, which Kuwaiti tax and accounting rules require us to hold for [7] years. If we cannot do what you ask, we will tell you why.

Write to [privacy email] or message us on WhatsApp. **We answer within 30 days.** We may ask you to confirm your identity first, so that nobody else can get at your data. There is no charge unless a request is repetitive or excessive.

We do not make decisions about you by automated means alone.

## 8. Keeping your data safe

We protect your data with encryption in transit, access limited to the people who need it, separate accounts with strong authentication for our staff, and records of who looked at what.

We do not store card numbers. Our payment provider handles those on its own systems.

No system is perfectly secure. If a breach happens that puts your rights at risk, we will notify CITRA as the law requires and tell you directly, explaining what happened, what it means for you and what we are doing about it.

## 9. Children

Our service is sold to people aged 18 and over. We do not knowingly collect data about children.

A parent or guardian may of course buy a plan for a child to use while travelling. In that case the account and the data are the adult's.

If you believe we hold a child's data, tell us at [privacy email] and we will delete it.

## 10. Website, cookies and marketing

Our website uses cookies that are necessary to make it work, and [analytics cookies] that tell us which pages people use. You can accept or decline the non-essential ones in the banner when you first visit, and change your mind later in your browser settings. Declining them does not stop you buying.

We send marketing messages — offers and new destinations — only if you have agreed to receive them. Every message tells you how to stop, and you can also reply STOP on WhatsApp or write to [privacy email]. Stopping marketing does not affect the messages we must send about a plan you have bought, such as your QR code or an expiry reminder.

## 11. Changes to this policy

We update this policy when what we do with data changes. The current version is always at [domain]/privacy, with the date of the last change at the top.

If a change materially affects your rights, we will tell you directly before it takes effect.

## 12. How to complain

If you are not satisfied with how we handled your request, you may complain to the **Communication and Information Technology Regulatory Authority (CITRA)**, which supervises personal data protection in Kuwait.

Last updated: 2 November 2026.