



Effecta Compliance Middle East Limited

Privacy Policy

Version 1.0

For internal Use Only

PRIVACY POLICY

| REGISTER OF AMENDMENTS | | | Issued 01 st Sept 2022 |
|------------------------|-------------------|------------------------------------|-----------------------------------|
| SR No. | Date | Reference Nos. of Sections Amended | Description |
| 1.0 | 01 September 2022 | All | New Document |
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PRIVACY POLICY

1. INTRODUCTION

- 1.1 Effecta Compliance Middle East Limited (“Effecta”, “we”, “us”, “our”), in the ordinary course of business, will collect, use, and share personal information pertaining to its partners, employees, clients and others. Obtaining this information is important to our ability to conduct our operations and to deliver the highest level of service, but we also recognize that you expect us to treat this information appropriately.
- 1.2 This Privacy Policy describes the types of personal information that Effecta may collect about you in compliance with applicable legal and regulatory requirements, the purposes for which we use the information, the circumstances in which we may share the information and the steps that we take to safeguard the information to protect your privacy.
- 1.3 We will use the personally identifiable information we collect about you to communicate with you with regards to your enquiry, to carry out our engagement with you, or to send you information about firm events or publications. We do, however, provide you with the opportunity to decline to be included in our marketing database. The data we hold is kept securely and only accessed by authorised personnel. The data gathered also will be shared appropriately between our offices in London and the UAE.
- 1.4 Other than to the extent permitted by law, we will not sell, share, or otherwise disclose any of the information it collects about you without your permission, though from time to time we may disclose your Personal Data to third parties who assist in preparing marketing mailings. We may also share personal data, with your permission, to processors who act on our behalf as per our engagement with you, details of which are enclosed in our contract.
- 1.5 We may revise this policy or any part of it at any time. We suggest you review the policy periodically for changes. If you no longer wish us to hold data about you, or wish to change the type of information we send to you, please contact us.
- 1.6 Our website is owned and managed by Effecta Compliance Middle East Limited.

2. Privacy Notice

- 2.1 This Privacy Notice explains how we, collect, use, share and otherwise process your Personal Data in connection with your relationship with being generally interested in our services and our publications in accordance with applicable data privacy laws and regulations relevant to your jurisdiction, such as the General Data Protection Regulation (“GDPR”) and the Data Protection Law, DIFC Law No.5 of 2020 (“DPL”).
- 2.2 We may provide supplemental privacy notices on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. Those supplemental notices should be read together with this Privacy Notice.

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3. Effecta Compliance Middle East Limited

3.1 This Privacy Notice is issued on behalf of Effecta Compliance Middle East Limited as data controller of your Personal Data.

4. Personal Data

4.1 The term “Personal Data” as used in this Privacy Notice means any information relating to you. Depending on the nature of your relationship with us, the types of personal data we collect may include:

- 4.1.1 Your identity (your full name, previous names, evidence of change of name); gender, date of birth, social media URL, passport/work permit/visa sponsorship/Emirates ID;
- 4.1.2 contact details including your name, personal email, home address and phone numbers so that we can contact you by email and text message;
- 4.1.3 details of your professional qualifications, skills, experience and training;
- 4.1.4 current and desired remuneration/compensation and other benefits;
- 4.1.5 educational history;
- 4.1.6 employment history;
- 4.1.7 contact details for employment and/or educational referees;
- 4.1.8 employment and/or educational references;
- 4.1.9 health/disability data and other information contained in your CV and/or that you choose to provide to us and it is relevant;
- 4.1.10 your feedback and responses to surveys and questionnaires;
- 4.1.11 technical data including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Site and if you visit other websites employing our cookies;
- 4.1.12 profile data including your username and password, your interests and preferences;
- 4.1.13 usage data including information about how you use our Site and services; and
- 4.1.14 marketing and communications data including your marketing and communication preferences.

Personal Data does not include data from which you can no longer be identified such as anonymised aggregate data.

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5. What we use your Personal Data for

5.1 We will process your Personal Data if and to the extent applicable law provides a lawful basis for us to do so. We will therefore process your Personal Data only:

- a) if you have consented to us doing so;
- b) (DIFC only) if we need it to take steps to enter into a contract to which you are a party, at your request;
- c) if we need it to perform the contract we have entered into with you;
- d) if we need it to comply with a legal obligation; or
- e) if we (or a third party) have a legitimate interest that is not overridden by your interests or fundamental rights and freedoms. Such legitimate interests will be the provision by us of compliance consultancy and training services, administrative or operational processes and direct marketing.

5.2 We will use your Personal Data to deliver compliance consultancy and training services to the institution you work or act for. We may also use your Personal Data to inform you about our services, new regulatory developments in the jurisdictions we act and our marketing events.

5.3 If you are a client or a supplier of goods and services, we will collect and process personal data about individuals in your organisation. We may enter the individual's name, business email, business address and other business data, into our database as a designated business contact for the organisation, for the purposes of contacting the organisation in relation to our services, or the supplier if we are a recipient of the supplier's goods and services. The source of business contact data may be the individual themselves, or their name and business details may be provided to us by a member of the organisation's HR or procurement department or an existing business contact at the organisation. We may also obtain limited data from websites, social media, public and other sources. We may send business to business email marketing to business contacts. A business contact can ask us at any time to stop sending business email marketing to their business email by contacting: info@effectacompliance.com.

5.4 Please note that we may use or disclose Personal Data if we are required by law to do so or if we reasonably believe that use or disclosure is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

6. What we may need from you

6.1 We may need to request specific information from you to help us confirm your identity and ensure your right to access Personal Data (or to exercise any of your other rights). This is another appropriate security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

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7. Special Categories of Personal Data

7.1 If you provide details revealing or concerning (directly or indirectly) racial or ethnic origin, communal origin, political affiliations or opinions, religious or philosophical beliefs, criminal record, trade union membership and health or sex life and including genetic data and biometric data where it is used for the purpose of uniquely identifying you, we will process this data only to the extent that it is necessary and relevant. Special categories of personal data will be processed in accordance with the restrictions imposed by law and will be retained for no longer than necessary before being deleted. If you choose to provide us with special categories of personal data (e.g. in your CV) and we do not need it, we will disregard this data.

8. Accuracy of information

8.1 It is important that the Personal Data we hold about you is accurate and current. Please let us know if your Personal Data changes during your relationship with us.

9. What if you do not provide the personal data we request?

9.1 It is in your sole discretion to provide Personal Data to us. If you do not provide us with all or some of the Personal Data we request, we may not be able to send you any publications or marketing information about services we believe may be of interest to you.

10. Change of purpose, anonymisation

10.1 We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

10.2 In some circumstances, we may anonymise your Personal Data so that it can no longer be associated with you, in which case it is no longer Personal Data.

11. Sharing your information

11.1 When using your Personal Data for the purposes and on the legal basis described above, we may share your Personal Data with our other Effecta offices as well as service providers we work with. We may also have to share your Personal Data with regulators, law enforcement agencies and other bodies discharging a public function. If we need to use your personal data for an unrelated or new purpose, we will notify you including the legal basis which allows us to do so.

12. Disclosing your Personal Data to third parties

12.1 To the extent necessary or appropriate and without notifying you, we may disclose your personal data to external third parties in the following circumstances:

- a) to companies and individuals we engage to perform business functions and services on our behalf. Examples of service providers include: providing payroll services to enable us to pay our employees; data storage facilities including inside and outside of the DIFC, Europe, UK, US and the Cloud; hosting our Web servers; providers of data analysis services, data

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analytics and producing statistics and for legal, accounting, audit and other professional services;

- b) to government agencies; law enforcement agencies; regulatory and supervisory authorities (such as the Commissioner of Data Protection);
- c) to third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, we will let you know; and
- d) to IT consultants carrying out maintenance, testing and development work on our IT systems, service providers who we may appoint as data processors and to other service providers from time to time.

12.2 Where applicable, we will impose appropriate contractual security, confidentiality and other obligations on third party service providers and our appointed data processors, based on the nature of the personal data to be protected and the services they provide to us. We will only permit them to process your personal data in accordance with the law and our instructions. We do not allow third party processors to use your personal data for their own purposes, they will be required to hold your personal data securely and when our relationship ends, we will ensure your personal data is retained for the period we instruct, securely returned to us, destroyed or anonymised so that you can no longer be identified.

12.3 Your personal data may be made available to the courts, government departments, appropriate regulatory authorities and other third parties inside or outside the DIFC in order to comply with applicable laws, the service of legal process, or if we reasonably believe that such action is necessary to: (a) comply with the law requiring such disclosure; (b) prevent crime, protect national security or for fraud detection and prevention; and/or (c) protect the personal safety of individuals using our Site or members of the public. We may process your personal data without your knowledge or consent in compliance with the above rules, where this is required or permitted by applicable law. In circumstances where third parties are controllers, they will be responsible for processing your personal data for their purposes and we may not be able to impose obligations or restrictions in connection with how they process your personal data (e.g. government and law enforcement agencies).

13. Your rights in relation to your information

13.1 If you are based within the EEA, you have rights as an individual which you can exercise under certain circumstances in relation to your Personal Data that we hold. These rights are to:

- a) request access to your Personal Data (commonly known as a “data subject access request”) and request certain information in relation to its processing;
- b) request rectification of your Personal Data;
- c) request the erasure of your Personal Data;
- d) request the restriction of processing of your Personal Data;
- e) object to the processing of your Personal Data – right to data portability.

13.2 If you are within the EEA, or where your data is processed in or through the DIFC, and you believe your data is being processed contrary to the Applicable Law and this privacy notice, you have the right to make a complaint at any time to relevant data protection office as listed below:

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UK Data Protection Office (ICO)
Information Commissioner's Office
Wycliffe House Water Lane
Wilmslow
Cheshire
SK9 5AF

+44 (0) 303 123 1113
icocasework@ico.org.uk

DIFC Data Protection Office
Dubai International Financial Centre Authority
Level 14, The Gate Building
DIFC, UAE

+971 4 362 2222
commissioner@dp.difc.ae

14. Right to withdraw consent

- 14.1 Where you have provided your consent to the collection, processing and transfer of your Personal Data, you have the right to fully or partly withdraw your consent. To withdraw your consent, please contact us. Once we have received notification that you have withdrawn your consent, we will no longer process your Personal Data for the purpose(s) to which you originally consented unless there are compelling legitimate grounds for further processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. In case we processed your Personal Data for direct marketing purposes, you have the right to object at any time, in which case we will no longer process your Personal Data for such marketing purposes.

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15. Retention of your Personal Data

- 15.1 We will only retain your Personal Data for as long as necessary to fulfil the purposes for which it was collected and processed. To determine the appropriate retention period for your Personal Data, we will consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 15.2 We may continue to retain some of your personal data for legal, compliance, accounting and tax purposes to keep basic information about our clients and customers (e.g. contracts, evidence of identity), financial and transaction data (e.g. payslips, invoices, receipts) for up to 7 years from when our relationship ends. The type of data we retain depends on the nature of our relationship with you and the services we have provided.
- 15.3 Upon expiry of the applicable retention period we will securely destroy your Personal Data in accordance with applicable laws and regulations.
- 15.4 All credit/debit card details and personally identifiable information will not be stored, sold, shared, rented or leased to any third parties.

16. Keeping your Personal Data Secure

- 16.1 We have put in place appropriate technical and organisational security measures to protect personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access or other unlawful forms of processing. In addition, we limit access to personal data to those employees, contractors and third parties who have a business need to do so. We have put in place procedures in the event of a personal data breach and we will notify you and the Commissioner (and, as applicable, other relevant supervisory authorities) of a breach when we are legally required to do so.

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17. Cookie, Analytics and Traffic Data

17.1 Cookies are small text files that are stored in your computer's memory and hard drive, in your mobile device or tablet when you visit certain web pages. They are used to enable websites to function or to provide information to the owners of a website, or other third parties who receive data obtained from that website.

17.2 When you visit any web site, it may store or retrieve information on your browser, mostly in the form of cookies. This information might be about you, your preferences or your device and is mostly used to make the site work as you expect it to. The information does not usually directly identify you, but it can give you a more personalized web experience.

Why do we use cookies?

17.3 Cookies help us to provide customized services and information. We use cookies on all our Site to tell us, in general terms, how and when pages in our Site are visited, what our users' technology preferences are – such as what type of video player they use – and whether our Site is functioning properly. Depending on their purpose, some cookies will only operate for the length of a single browsing session, whilst others have a longer life span to ensure that they fulfil their longer-term purposes (as explained in more detail below). Please note that, however long the cookies' active life may be, you can delete cookies (and therefore stop any further data collection by them) as further described below.

17.4 In broad terms, we use cookies on our Site for the following purposes:

- a) Analytical purposes: Analytical cookies allow us to recognize measure and track visitors to our Site and compile a record of this usage information. This helps us to improve and develop the way our Site works, for example, by determining whether visitors to the Site can find information easily, or by identifying the aspects of Site that are of the most interest to them.
- b) Session management: The software that runs our Site uses cookies for technical purposes needed by the internal workings of our servers. For instance, we use cookies to distribute requests among multiple servers, authenticate users and determine what features of the site they can access, verify the origin of requests, keep track of information about a user's session and determine which options or pages to display in order for the Site to function.

17.5 Please note that third parties may use cookies. The kind of cookies and the consequent data processing carried out by such third parties are regulated by their privacy policy.

Your cookie preferences

17.6 Cookies are necessary in order for you to be able to make full use of our Site. If you chose to disable cookies, some of our Site's functionality might be impaired.

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Third party cookies

- 17.7 When you visit our Site, you may receive cookies that are set by third parties. These may include cookies set by Google Analytics, WordPress or Vimeo.com. These cookies are used for the purposes described in the “Why Do We Use Cookies?” section of this policy. We do not control the setting of these third party cookies, so we suggest you might wish to check the third party websites for more information about their use of cookies and how to manage them.
- 17.8 For more information about how Google Analytics collects and processes your data, please visit www.google.com/policies/privacy/partners.

Amending cookie preferences

- 17.9 If you wish to remove cookies set by our Site from your browser in the future, you may delete them. The instructions for removing cookies from your computer or mobile device depend on the operating system and web browser you use. Please note, however, that withdrawing your agreement to the use of cookies on our Site will impair the functionality of the Site.
- 17.10 The site www.allaboutcookies.org includes instructions for managing cookies on many commonly used browsers, or you may consult the vendor documentation for your specific software.

Do Not Track

- 17.11 “Do not track” signals are preferences that users can set on their web browsers to limit how their activity is tracked across online services. The Site does not respond to “do not track” signals in your web browser
- 17.12 Effecta does not allow third parties to advertise on our websites.

18. Links to Other Websites

- 18.1 Our site may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy statements.

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19. Marketing Messages

18.2 We will ask you for consent to send you direct marketing communications via email. If you are a business contact, you may receive email marketing communications from us even if you have not given us consent, as we rely on legitimate interests.

18.3 You may receive email marketing messages from us if you provided us with your details at a promotional or networking event or attended a training course and you have given us consent to send you marketing. If you give us consent, we may also use your identity, contact details, technical data, usage data and profile data to form a view and decide which services may of interest or relevant for you. You have the right to withdraw your consent to marketing at any time.

18.4 Opting out and 'unsubscribing' from email marketing messages does not apply to personal data that you have provided to us in connection with the performance of a contract between us. We will never sell or disclose your personal data to any third parties to use for marketing.

20. Fees

19.1 You will in general not have to pay a fee to exercise any of your individual rights mentioned in this Privacy Notice.

21. Changes to this privacy policy

20.1 We reserve the right to update this privacy policy at any time, and we will make an updated copy of such privacy notice available on our website. Changes will be effective on the day they are posted.

22. Further information

21.1 If you have any concerns or require any further information, please do not hesitate to contact us on info@effectacompliance.com.