

BSA Ahmad Bin Hezeem & Associates LLP

Online Privacy Policy

Version 2.0

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Version Control

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BSA Ahmad Bin Hezeem & Associates LLP and/or its affiliates and entities (collectively “BSA LLP”, “we” or “us” or “our”) values your security and privacy. BSA LLP is required to comply with DIFC Authority’s Data Protection Law, DIFC Law No. 5 of 2020 and its amendment DIFC Law No. 2 of 2022 (the “DP Law”), and may for certain types of personal data processing, be subject to laws from other jurisdictions.

As such, it is the policy of BSA LLP to respect the privacy of its Website Services. In accordance with the DP Law, BSA LLP collects information about you when you use or access our websites, use BSA LLP email addresses for contact purposes, as well as other communications you have with us.

This online data protection policy (the “Policy”) sets out the basis on which any information, including any personal data, we collect from you, or you provide to us, will be processed by BSA LLP. Each time you access or use the Website Services or provide us with information, by doing so you acknowledge the practices described in this Policy.

1) SCOPE AND APPLICATION

This Policy applies to persons anywhere in the world who access or use BSA LLP’s website (“Users”).

2) COLLECTION OF INFORMATION

a) Information you give us

This is personal data you give us by corresponding with us (e.g., by telephone, e-mail or any other digital or electronic form). It includes for example information you provide when you contact us, register for newsletters or other subscription services.

If you contact us, we will keep at least an electronic record of such correspondence, including personal information shared at that time, in order to reply or process it as per your request. The personal information you give us may include your name, address, e-mail address and phone number, certain device information, residential building, work address, photograph, and other information you choose to provide (“Personal Information” or “Personal Data”).

The Website Services collect and process Personal Data in accordance with the DP Law and applicable laws, including for specific, lawful purposes explained herein or at the time of collection, or for the performance of tasks carried out in your interests or the legitimate interests of BSA LLP.

The Website Services are not targeted, intended or expected to be of use to children. Apart from providing information for specific services or purposes, as directed by BSA LLP processes, User-provided contributions of content or contact information regarding or about children are expressly prohibited.

b) Information we collect about you and your device

Each time you use our Website Services we may and often will automatically collect the following information:

- Technical information, including the type of mobile device you use, a unique device identifier (for example, mobile network information, your mobile operating system, the type or mobile browser you use, device token, device type, time zone setting (“Device information”).
- Details of your use of our Website Services but not limited to traffic data, and other communications data, and the resources that you access (“Log information”)
- Location information if you want to use the Website Services to determine your current location.

If you do not wish to share certain data with us or do not want us to use / share it for certain purposes (to the extent possible, in accordance with applicable laws and information in this notice), you can alter your preferences at any time. Where applicable, please check with your device provider's instructions for further information about how to do this.

c) Other Information We May Collect Through Your Use of the Website Services

When you use any Website Services, we may collect Personal Data including demographic information which may include but is not limited to, age/birth date, current residence, gender, mobile network information, device location, your mobile operating system, the type of browser you use, browsing history information, searching history information, etc.. (“Demographic information”)

3) USE OF PERSONAL DATA

We may use Personal Data which you provide to us or we collect from you to:

- Provide, maintain and improve our Website Services, develop new features that will enhance your user experience and our efficiency.
- Perform internal regulatory, administrative and operational requirements, for example, to prevent fraud or abuse of our Website Services , to troubleshoot software bugs and operational problems; to conduct permitted data analysis, testing and research; to ensure you and BSA LLP are complying with internal and external legal requirements, including those that necessitate use of digital systems; and to monitor usage and activity trends;
- Send you communications we think will be of interest to you based on your previous interactions with us, including information about our services, news and BSA LLP events, where permissible under DIFC Laws and according to any other applicable laws.
- Notify you about changes to this Policy and Website Services;

- Keep our Website Services safe and secure;
- Personalize and improve the Website Services; including to provide and recommend features, content, social connections, referrals, in accordance with your preferences, to the extent permissible by law.

4) PROCESSING, STORAGE AND TRANSFER OF PERSONAL DATA

We will take all steps reasonably necessary to ensure your Personal Data is processed fairly and lawfully, in accordance with the DP Law, other applicable laws and this Policy. By submitting your Personal Data (including Log, Device and / or Demographic Information), we expect you to understand that such transfer, storing or processing in order for BSA LLP to perform its general administrative functions is necessary and will be done in a proportionate, lawful manner, including but not limited to responding to enquiries you raise via the Website Services, oversight of the business entities registered in DIFC's jurisdiction and maintaining contacts for future informational or promotional activities. Unless otherwise notified, BSA LLP does not ordinarily rely solely on automated decision making when processing your Personal Data.

In order to conduct our operations or fulfill regulatory obligations, we must transfer the Personal Data described in this Policy to and from, and process and store in it, the United Arab Emirates and (where applicable or required) with processors in other countries, some of which may have less protective privacy laws than those where you reside. In all such cases, and generally for any processing operations, we take appropriate security measures to protect your Personal Data in accordance with this Policy.

We may process your data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

To preserve the integrity of our databases, to carry out on-going Website Services on behalf of all Users, for research, analytics and statistics purposes and to ensure compliance with applicable laws and regulations, we retain Personal Data submitted by Users for a reasonable length of time unless otherwise prescribed by applicable law.

BSA LLP is not responsible for the accuracy of the information you provide and will modify or update your Personal Data in our databases when you provide updated information or ad hoc upon your request, as further outlined below. We will erase or put beyond active use your Personal Data upon request, unless

we are required to retain it in accordance with DIFC or other applicable laws or to perform agreed services, in which case we align with applicable principles such as purpose specification and data minimization.

If it is not disproportionate or prejudicial, and required beyond this policy's notices, we will contact you to let you know we are processing your personal information.

By accessing or using the Website Services to which this Policy applies, we can reasonably expect that you understand that all information submitted by you through the Website Services or otherwise to BSA LLP may be used by BSA LLP to support these processing operations, in accordance with applicable laws and its policies.

5) SHARING OF PERSONAL DATA

We may share Personal Data which we collect about you as described in this Policy or as described at the time of collection or sharing, including as follows:

a) Through our Website Services

We may share your Personal Data with:

- With third parties to provide you a service that you requested through a partnership or promotional offering made by a third party or us;
- With third parties with whom you choose to let us share your Personal Data, for example other Website Services.

b) Other types of Data Sharing

We may share your Personal Data with:

- BSA LLP affiliated entities, to the extent permissible by law;
- With vendors, consultants, marketing and advertising partners, and other service providers who need access to such Personal Data to carry out on our behalf or to perform a contract we enter into with them;
- If we otherwise notify you and you provide your affirmative opt-in to share your data, where needed;
- In response to a request for information by a competent authority or government entities if we determine that such disclosure is in accordance with, or is otherwise required by any applicable law, regulation, or legal process;

- With law enforcement officials, government entities or authorities or other third parties are required by applicable law;
- With third parties in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing or acquisition of all or a portion of our business by or into another company; or
- With third parties in an aggregated and/or anonymized or pseudonymized form that cannot reasonably be used to identify you.

c) Government Data Sharing

In some circumstances we are legally obliged to share information with public authorities or law enforcement agencies. For example, we may be required to provide information related to a court order or investigations. In any scenario, we'll attempt to satisfy ourselves that we have a lawful basis on which to share the information, document our decision making and satisfy ourselves that we have a legal basis on which to share the information.

6) YOUR RIGHTS AND CHOICES

a) Marketing and Preferences

BSA LLP supports Users' legal rights to opt-in or subsequently opt-out of receiving communications from us and our partners. You have the option to ask us not to process your Personal Data for marketing purposes and to remove it from our database, to not receive future communications or to no longer receive our Website Services.

b) You may change your preferences at any time

Please note that we may continue to send you transactional or service-related e-mails despite your desire to not receive promotional or marketing e-mail messages. Additionally, please note that if you elect to opt-out of or unsubscribe from receiving promotional or other similar e-mails or messaging from one of our Website Services, you may continue to receive promotional emails from our other websites, providers, or other, non-affiliated marketers whose services you may have accessed via BSA LLP Website Services. Finally, while we may remove your individual contact information from our professional contacts database, please be aware that if such information is in a different, third party's marketing directory through your request or election, you will need to request removal with such third party directly.

c) Access to and Correction of Your Personal Information

You have the right to access information held about you. Your right of access can be exercised for any reason, at any time, in accordance with DIFC and other applicable laws.

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

You may also request that we restrict the processing of, erase, transfer the information you gave us from one organization to another, or otherwise process your Personal Data in line with the relevant articles providing for such rights set out in the DP Law or other applicable laws.

Any access request generally comes at no cost to you and we must respond within one month unless provided otherwise by the DP Law or other applicable laws. We may, where permissible, impose a reasonable fee to meet any extraordinary administrative costs in providing you with details of the information we hold about you.

When you contact us about a potential Personal Data error or query, we will endeavor to confirm or verify the information in question, then correct verified inaccuracies and respond to the original inquiry. We will endeavor to send a correction notice to businesses or others whom we know to have received the inaccurate data, where required and / or appropriate. However, some third parties and third party sites may continue to process inaccurate data about you until their databases and display of data are refreshed in accordance with their update schedules, or until you contact them personally to ensure the correction is made in their own files.

As set out in Article 39 on the DP Law, we may not discriminate against you for exercising your rights by denying services or changing prices or quality of service, unless reasonable to do so in general, as objectively determined, and applicable to all individuals offered or receiving such benefits.

7) SECURITY PRECAUTIONS

BSA LLP makes every effort to ensure that your Personal Data is secure on its system. BSA LLP has staff dedicated to maintaining our data protection and security policies, periodically reviewing them and making sure that BSA LLP employees are aware of our data protection and security practices. Unfortunately, no data transmission over the internet can be guaranteed to be 100% secure. As a result, BSA LLP cannot warrant or guarantee the security of any Personal Data you transmit to us, and you do so at your own risk.

BSA LLP has established policies and procedures for securely managing information and protecting Personal Data against unauthorized access. We continually assess our data privacy, information management and security practices. We do this in the following ways:

- Establishing policies and procedures for securely managing information;
- Limiting employee access to viewing only necessary information in order to perform his or her duties;
- Protecting against unauthorized access to Personal Data by using data encryption, authentication and virus detection technology, as required;
- Requiring service providers with whom we do business to comply with relevant data privacy legal and regulatory requirements;
- Monitoring our website through recognized online privacy and security organizations;
- Engaging in regular third-party audits of our policies and practices; and
- Conducting background checks on employees and providing training to our employees.

If you have any further questions about our security and processing activities, please contact the Data Protection Officer. To the extent permitted by applicable law, BSA LLP expressly disclaims any liability that may arise should any other third parties obtain the Personal Data you submit through fraud or otherwise where it is no fault of BSA LLP.

8) COOKIES

A cookie is a small text file that is unique to the web browser on your computer or mobile device, which is used to retain user preferences, and enhance browsing experience ("Cookie"). BSA LLP uses Cookies to track overall site usage and enables us to provide a better user experience. We do not use Cookies to “see” other data on your computer or determine your email address.

Types of cookies we drop, and the information collected using them include but are not necessarily limited to:

Essential

Google Tag Manager - helps make tag management simple, easy and reliable by allowing marketers and webmasters to deploy website tags all in one place.

Site Analytics

Google Analytics - gives website owners the digital analytics tools needed to analyze data from all touchpoints in one place, for a deeper understanding of the customer experience.

Advertising

- DoubleClick - a subsidiary of Google which develops and provides Internet ad serving services.
- Twitter Advertising - enables website owners to track and measure the actions users take after viewing or engaging with ads on Twitter.
- Instagram Advertising - lets website owners measure, optimize and build audiences for advertising campaigns.
- LinkedIn Analytics – enables website owners to promote their company updates to targeted audiences on desktop, mobile, and tablet.

Most browsers accept and maintain Cookies by default. The DP Law requires that DIFC entities, set such collection methods to collect the bare minimum, necessary cookies in order to operate the relevant website. Check the 'Help' or 'Settings' menu of your browser to learn how to change your Cookie preferences. You can choose to alter Cookies settings related to the use of our Website Services, but this may limit your ability to access certain areas of the Website.

Alternatively you may wish to visit an independent source of information, www.aboutcookies.org, which contains comprehensive information on how to alter settings or delete Cookies from your computer as well as more general information about Cookies. For information on how to do this on the browser of your mobile phone you will need to refer to your handset manual or network operator for advice.

9) CHANGES TO THIS POLICY

BSA LLP may change this Policy from time to time and without notice. If we make significant changes in the way we treat your Personal Data, or to the Policy, we will endeavour to provide you notice through the Website Services or by some other means, such as email. Your continued use of the Website Services after such notice constitutes your understanding of the changes. We encourage you to periodically review this Policy for the latest information on our privacy practices. We provide links to it through:

- The Website Services
- Incorporating it into our contracts, agreements, and other documents as necessary or appropriate

10) CONTACT US

If you have any questions, comments or complaints relating to this Policy or the manner in which we collect and use your personal data, please note that BSA LLP has appointed a Data Protection Officer in accordance with Article 16 of the DPL. The DPO, Lily Eid, may be contacted using the below address or telephone number +971 4 5285555 , or via email at lily.eid@bsabh.com

Telephone number: 971 4 5285555

Physical address: Precinct Building 3, Level 6, Office 605, Dubai International Financial Center, Dubai, United Arab Emirates.

You also have the right to submit a complaint to the DIFC Data Protection Commissioner in relation to our handling of your data.

You may also contact the DIFC Commissioner of Data Protection's Office at:

Dubai International Financial Centre Authority

Level 14, The Gate Building

+971 4 362 2222

commissioner@dp.difc.ae