

PRIVACY POLICY

INTRODUCTION

Welcome to E-Darat's privacy policy.

E-Darat respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (our **Site**) (regardless of where you visit it from) or use our E-Darat HR solution (**Solution**) and/or mobile application (**App**) (collectively, our **Platforms**) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

Please also use the [Glossary](#) to understand the meaning of some of the terms used in this privacy policy.

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IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy policy

This privacy policy aims to give you information on how E-Darat collects and processes your personal data through your use of our Site and Platforms, including any data you may provide through our Site and Platforms when you contact us for more information or use our Solution or App, including when you sign-up for a free trial.

Our Site and Platforms are not intended for use by children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide 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 data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

E Darat DMCC is responsible for the Site and Platforms (collectively referred to as **E-Darat, we, us or our** in this privacy policy). E-Darat is the controller and responsible for your personal data in relation to use of the Site. E-Darat is a joint controller (together with your employer) and responsible for your personal data in relation to use of the Platforms.

We have appointed a data protection officer (**DPO**) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise Your legal rights, please contact our DPO using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name of legal entity: E Darat DMCC

Email address: privacy@e-darat.com

Telephone number: +971 4276 4272

You have the right to make a complaint at any time to the relevant regulator. We would, however, appreciate the chance to deal with your concerns before you approach any regulator(s) so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This Version 1 was last updated on 1 October 2020. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us and, in particular, please keep your profile on the Platforms up-to-date.

Third-party links

Our Site and Platforms 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. When you leave our Site or Platforms, we encourage you to read the privacy policy of every website you visit.

THE DATA WE COLLECT ABOUT YOU

Data we will collect

Personal data, or **personal information**, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- (a) **Identity Data** includes first name, middle name(s), last name, photograph, dependants, marital status, title, date of birth, place of birth, gender, education, work experience, current and previous positions, appraisals, nationality, passport details, identity card details, residency visa details and labour card details.
- (b) **Contact Data** includes geolocation (map), address, email address and telephone numbers.
- (c) **Financial Data** includes details of salary and allowances (for example, transport and housing allowances), payroll elements, leave, business trips, bank account and loans.
- (d) **Technical Data** includes internet protocol (IP) address, your login data, time zone setting and location, operating system and platform, and other technology on the devices you use to access the Site and our Platforms.
- (e) **Profile Data** includes your username.
- (f) **Usage Data** includes information about how you use our Site and the Platforms.

- (g) **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- (h) **Special Category Data** includes information related to your health such your blood type and health records and your religion.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

Other than as detailed above under the category of Special Category Data, we do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you or your employer, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you or your employer (for example, to provide you with access to the Platforms). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact, Financial, Profile, Marketing and Communications and Special Category Data by filling in forms (including any forms in the Platforms) or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- (a) request more information and/or a free trial of the Platforms;
- (b) subscribe to our Platforms;
- (c) create, complete, update or otherwise modify your profile in our Platforms;
- (d) request marketing to be sent to you; or
- (e) give us feedback or contact us.

Automated technologies or interactions. As you interact with our website, we will automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our [Cookie Policy](#) for further details.

Third parties or publicly available sources. We will receive personal data about you from various third parties as set out below:

- (a) Identity, Contact, Financial and Special Category Data from your employer.
- (b) Identity and Contact Data from a relative or friend where you are a designated dependent or emergency contact of that person.
- (c) Technical, Marketing and Communications and Usage Data, from analytics providers such as Google based outside the United Arab Emirates.

- (d) Identity and Contact Data from brokers, insurers or underwriting agencies based inside or outside the United Arab Emirates.
- (e) Identity and Contact Data from search information providers such as LinkedIn based outside the United Arab Emirates.

HOW WE USE YOUR PERSONAL DATA

When we will use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- (a) where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and/or
- (b) where we need to comply with a legal obligation;

Click [here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you. You have the right to withdraw consent to third party marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as the representative of a customer and/or to set up a free demonstration of the Platforms	(a) Identity (b) Contact	Necessary for our legitimate interests (for running our business and provision of administrative and IT services)
To manage our relationship with you which will include notifying you about changes to our privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	Necessary to comply with a legal obligation
To administer and protect our business, the Site and our Platforms (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical (d) Usage (e) Special Category (f) Profile	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)

	(g) Marketing and Communications	Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Financial (d) Profile (e) Usage (f) Marketing and Communications (g) Technical	Necessary for our legitimate interests (to study how users use our products and services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our Site, the Platforms, marketing, customer relationships and experiences	(a) Technical (b) Usage (c) Marketing and Communications	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Site updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Financial (d) Profile (e) Usage (f) Marketing and Communications (g) Technical	Necessary for our legitimate interests (to develop our products/services and grow our business)
To share your data with third parties for them to market goods and services that may be of interest to you	(a) Identity (b) Contact (c) Financial (d) Marketing and Communications (e) Usage (f) Technical	Consent

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You have the right to object to marketing at any time by contacting us. See [Your legal rights](#) below for more information.

Promotional offers from us

We may use your Identity, Contact, Financial, Usage, Technical and Marketing and Communications Data to form a view on what we think you may want or need, or what may be

of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or use our Solution and/or App and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of your use of our Solution and/or App.

E-Darat will have no liability in the event that a third party continues to send you marketing messages after you have requested that they stop.

Cookie

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Site and Platforms may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookie Policy](#).

Change of purpose

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 and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

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.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table *Purposes for which we will use your personal data* above:

- (a) Internal Third Parties.
 - (i) Other companies in the Chedid Group who are based in Lebanon and provide technical, system and diagnostics support for our Site and Platforms and enter data into the Platforms.
 - (ii) When your employer has requested an introduction, insurance brokers, insurers or underwriting agencies in the Chedid Group based in Cayman Islands, the countries of the Gulf Cooperation Council or the Middle East and North Africa for the purposes of facilitating that introduction.
 - (iii) When your employer has obtained an insurance policy through an insurance broker, insurer or underwriting agency in the Chedid Group based in Cayman Islands, the countries of the Gulf Cooperation Council or the Middle East and North Africa, the relevant entity who will enter data about such insurance into the Platforms.

- (iv) Other companies in the Chedid Group for their marketing activities such as making suggestions and recommendations to you about goods or services that may be of interest to you.
- (b) External Third Parties.
 - (i) Service providers acting as processors based in Lebanon and the United Arab Emirates who provide IT and system administration services and website administration services.
 - (ii) When your employer has requested an introduction, insurance brokers, insurers or underwriting agencies for the purposes of facilitating that introduction.
 - (iii) When your employer has obtained an insurance policy through an insurance broker, insurer or underwriting agency, the relevant entity who will enter data about such insurance into the Platforms.
 - (iv) Third parties for their marketing activities such as making suggestions and recommendations to you about goods or services that may be of interest to you.
- (c) 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, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

INTERNATIONAL TRANSFERS

We share your personal data within the Chedid Group. This will involve transferring your data outside the United Arab Emirates.

Many of our external third parties are based outside the United Arab Emirates and so their processing of your personal data will involve a transfer of data outside the United Arab Emirates.

Whenever we transfer your personal data out of the United Arab Emirates, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- (a) We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the Commissioner of the Dubai International Financial Centre and the Registrar of the Abu Dhabi Global Market.
- (b) Where we use service providers which are not in a country that has been deemed to provide an adequate level of protection, we may use specific contracts approved by the Commissioner of the Dubai International Financial Centre and the Registrar of the Abu Dhabi Global Market which give personal data the same protection as it has in the Dubai International Financial Centre or the Abu Dhabi Global Market (as applicable).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the United Arab Emirates.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we 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, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity and Financial Data) for ten (10) years after they cease being customers.

In some circumstances you can ask us to delete your data. See [Your legal rights](#) below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- (a) **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- (b) **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- (c) **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. In addition, where we are able to comply with your request, we may not be able to provide certain products or services to you.
- (d) **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- (e) **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - (i) if you want us to establish the data's accuracy;

- (ii) where our use of the data is unlawful but you do not want us to erase it;
 - (iii) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- (f) **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- (g) **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at privacy@e-darat.com. For any other information or complaint please contact us by e-mail at info@e-darat.com.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

GLOSSARY

LAWFUL BASIS

"Legitimate Interest" means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

"Comply with a legal obligation" means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

"Consent" means that you have given an unambiguous indication of your consent to us processing your personal data for a specific purpose.