

**U DISTRIBUTION COMPANY DMCC
DATA PROTECTION AND PRIVACY POLICY**



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INTRODUCTION

We are committed to protecting your Personal Data and respect your privacy. This policy explains how U Distribution Company DMCC (the “**Company**”, “**us**”, “**we**”, “**our**”) deals with Personal Data of individuals that interact with the Company and addresses our dedication to safeguarding Personal Data as mandated by the Federal Law No. 45 of 2021 (the “**Data Protection Law**”) and other applicable data protection laws.

This policy applies to all Personal Data collected, processed, or stored by the Company, whether electronically or in hard copy, and to all employees, contractors, and third parties who handle Personal Data on behalf of the Company. This includes Personal Data that you provide to us and Personal Data that we collect automatically when you visit or interact with us. In some cases, we may also collect Personal Data about you from third parties (e.g. recruitment agencies; marketing agencies). In some circumstances, we may also collect Sensitive personal information about you.

This policy can be incorporated by reference by all our subsidiaries, parent undertaking and fellow subsidiary undertakings of our parent undertaking (together with the Company the “**Group**”).

DEFINITIONS

For the purpose of this Policy, the following definitions shall apply:

“**DPO**” means a data protection officer appointed by the Company.

“**European Economic Area**” or “**EEA**” means the Member States of the European Union, Switzerland, Iceland, Liechtenstein, and Norway.

“**GDPR**” means the Regulation (EU) 2016/679 (General Data Protection Regulation).

“**Personal Data**” means any information about an identified or identifiable person. This includes where you can be identified, directly or indirectly, including by reference to an identifier (for example, a name or email address, or an online identifier such as a unique device identification number).

“**Process**” and “**processing**” means the various things we may do with your Personal Data, including using, disclosing, holding, recording, storing, transferring or otherwise handling that information.

“**Sensitive personal information**” means some types of Personal Data which, depending on jurisdiction, includes information about someone’s racial or ethnic origin, political opinions, religious beliefs or affiliations, health or medical conditions, genetic information, biometric information, sexual orientation, criminal record, trade-union membership and political association membership.

ACCEPTANCE OF THE COMPANY’S ROLE

Company as controller

The Company is the controller of your Personal Data if we have a relationship with you.

The Company can collect, use and disclose your Personal Data to third parties, as described below. When you provide Personal Data to the Company, you acknowledge that you have read this policy and, where required under applicable law, consent to the collection, use and disclosure of your Personal Data in accordance with this policy. You may, as provided by applicable law, be free to refuse or withdraw your consent.

Company as processor

In some circumstances, the Company can act as the processor of Personal Data which we may receive from companies of the Group and third parties acting as controllers and Process it on behalf of them. In doing so, the Company will act under authority of the controller. A relationship between the Company and the controller will be in accordance with the applicable laws and based on a data processing agreement in the agreed form.

DATA PROTECTION PRINCIPLES

We adhere to the following key data protection principles:

- a. **Lawfulness, Fairness, and Transparency:** We will process Personal Data lawfully, fairly, and transparently, ensuring that individuals are informed about how their Personal Data is used.
- b. **Purpose Limitation:** Personal Data will only be collected and processed for specific, explicit, and legitimate purposes in accordance with this policy.
- c. **Data Minimization:** We will collect and process only Personal Data that is necessary for the purposes for which it is processed.

- d. **Accuracy:** Personal Data will be accurate and kept up-to-date. Individuals have the right to request rectification of inaccurate data.
- e. **Storage Limitation:** We will retain Personal Data only for as long as necessary for the purposes for which it was collected.
- f. **Security:** We implement appropriate technical and organizational measures to protect Personal Data from unauthorized access, disclosure, alteration, or destruction.
- g. **Data Subject Rights:** We respect individuals' rights regarding their Personal Data, including the right to access, rectify, erase, or object to processing.

USE OF PERSONAL DATA

We collect and use your Personal Data for the purposes of the Group's business operations and for purposes which are reasonably compatible to the ones described below:

- a. Supply our products and services to you;
- b. Prepare and manage contracts with you;
- c. Market our products;
- d. Respond to your queries and provide you with information that you requested;
- e. Manage complaints and claims;
- f. Manage and improve our processes and our business operations;
- g. Manage your account on the Company's website;
- h. Identify you and authenticate your access rights access to our website and systems;
- i. Invite you to provide feedback or attend events;
- j. Perform analytics, market research;
- k. Manage our workforce effectively;
- l. Manage our archiving and records;
- m. Manage our network and information systems security;
- n. To follow applicable laws and regulations;
- o. To respond to requests from competent public authorities;
- p. To tell you about changes to our terms, conditions and policies.

We may also use your Personal Data for our legitimate interest, where you will reasonably expect the processing of your Personal Data. We will endeavour to balance your interests and will not disclose more of your Personal Data than required.

PROCESSING OF PERSONAL DATA

We may use and share your Personal Data, which may sometimes include Sensitive personal information, within our Group as well as with third parties. If we collect and process Sensitive personal information about you we will only do this where you have explicitly provided your consent or where otherwise permitted by applicable laws and regulations.

Disclosure of Personal Data within the Group

The Company does business in many countries, hence Personal Data, which may sometimes include Sensitive personal information, collected in one country can be processed by a company of the Group in another country. Laws of a country where Personal Data was collected can differ from the laws of a country where that Personal Data can be processed. We will endeavour to obtain appropriate and enforceable assurances from a company of the Group to which we disclose or transfer Personal Data that it will safeguard Personal Data in a manner consistent with this policy.

Disclosure of Personal Data to third parties

If we need to disclose Personal Data to third parties (other than companies of the Group), located in a different country to where the information was collected, we will take reasonable steps to ensure that there is a lawful basis for the disclosure and that the disclosure complies with all applicable laws. This may include obtaining an individual's consent prior to such transfer and/or entering into a legally binding contract with the recipients of Personal Data under which they are obliged to handle it in accordance with applicable laws. However, in some circumstances, the Company can be required to transfer Personal Data without obtaining prior consent or entering into a legally binding contract (e.g. by operation of law; court order).

Cross-border transfers of Personal Data originating from the EEA

If your Personal Data is originating from EEA, we will process it in line with the GDPR. When we transfer Personal Data originating from EEA to a country outside the EEA or which does not have adequate level of data protection as per the European Commission's decision, we will do so in accordance with the model contractual clauses on the basis of converging principles that are shared by the standard contract clauses adopted by the European Commission. These will enable us to make transfers of Personal Data originating from EEA within our Group and to third parties and ensure that recipients of Personal Data meet the GDPR standards.

Prevention

If we become aware that a third party which received Personal Data from us is using or disclosing Personal Data in a manner contrary to this policy, we will endeavour to take reasonable steps to prevent or stop such use or disclosure.

OUR WEBSITE

The Company's website may use cookies and similar technologies. You can choose to accept or decline cookies. If you choose to decline cookies, not all elements of our website and services may function properly. To the extent that your local laws consider the information collected by cookies and other technologies as Personal Data, we will treat that information to the standards set out in this policy.

The Company's website may contain links to other websites. We are not responsible for the content and privacy practices of other websites.

JOB APPLICATIONS

Within the recruitment process, the Company may collect and store Personal Data about you. We may collect Personal Data directly from you or from third parties, e.g. recruitment agencies. We can also obtain information from professional social networks, job boards, and from other publicly accessible sources for the purposes of actively approaching you with job offers or for the purpose of confirming the accuracy of the information presented by you within the course of the application.

DURATION

We will always keep your Personal Data for the period required by applicable law and where we need to do so in connection with legal action or an investigation involving the Company.

LEGAL RIGHTS IN RELATION TO PERSONAL DATA

You have the right to request information about your Personal Data, update your Personal Data provided to us or, under certain conditions, erase your Personal Data (right to be forgotten).

You also have the right to:

- a. request access to your Personal Data that we hold (including receiving a copy of your Personal Data);
- b. obtain without undue delay the rectification of inaccurate Personal Data;
- c. request the restriction of the processing of your Personal Data;
- d. withdraw your consent where the Company obtained your consent to process Personal Data (without this withdrawal affecting the lawfulness of processing prior to the withdrawal);
- e. request erasure of Personal Data if it is no longer necessary in relation to the purposes for which it was collected or Processed;
- f. object to the processing of your Personal Data for other purposes in certain cases where the Company processes your Personal Data on another legal basis than your consent;
- g. request a copy of an agreement under which Personal Data is transferred outside the Company's country of registration;
- h. request and receive information about processed Personal Data and breaches;
- i. file a complaint with the competent data protection authority.

In addition, you also have the right to data portability. This is the right to obtain the Personal Data you have provided to the Company in a structured, commonly used and machine-readable format and request the transmission of such Personal Data to you or a third party, without hindrance from the Company and subject to your own confidentiality obligations.

Please contact the DPO, whose contact information is provided below, if you wish to exercise any of your rights.

INFORMATION SECURITY

The Company takes reasonable and appropriate precautions to protect Personal Data in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction, and to respond to the misuse, loss or unauthorized use of such Personal Data.

NOTIFICATION OF BREACH

We will notify you without undue delay after becoming aware of a confirmed breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, your Personal Data transmitted, stored or otherwise processed (the “**Breach**”), unless such Breach is unlikely to result in a risk to your rights and freedoms. We will provide you after the notification of the Breach and insofar as this is possible, the detailed information about the Breach and the measures taken or proposed to be taken by the Company to address the Breach, including, where appropriate, measures to mitigate its possible adverse effects. The Company will maintain a record of Breaches which includes facts about the Personal Data breach, its effects (if any) and the remedial action taken to resolve the breach. The Company will notify the competent data protection authority in accordance with the applicable data protection laws.

DATA PROTECTION OFFICER (DPO)

The Company has appointed a DPO responsible for overseeing data protection efforts and ensuring compliance with the Data Protection Law and other data protection laws. Contact information of the DPO is provided below.

TRAINING AND AWARENESS

We provide training and raise awareness among our employees regarding their responsibilities under the Data Protection Law and other applicable data protection laws.

REVIEW AND UPDATE

This policy will be reviewed and updated periodically to ensure ongoing compliance with the applicable data protection laws and evolving best practices.

CONTACT INFORMATION

For any questions about this policy or concerns related to protection of Personal Data or to exercise your data subject rights, please contact the Company and DPO

Company as controller
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