

PRIVACY AND COOKIE POLICY

Al Qana Property Management LLC

1. INTRODUCTION

Al Qana Property Management LLC respects your privacy and is committed to protecting your Personal Data. This privacy and cookie policy ("**Policy**") sets out how we look after the Personal Data which you have provided to us, including when you visit our website (regardless of where you visit it from) and tells you about your privacy rights and how the law protects you.

It is important that you read this Policy together with other policies which 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 Policy supplements other notices and privacy policies and is not intended to override them.

Al Qana Property Management LLC is the controller and responsible for your Personal Data (referred to as "Company", "we", "us" or "our" in this Policy).

The Personal Data provided to us is subject to laws and regulations of the UAE as applied in the relevant Emirate, including the UAE federal laws ("**UAE Laws**"). If there is ever any conflict between this Policy and UAE Laws, the UAE Laws will apply.

2. THE DATA WE COLLECT ABOUT YOU

We may collect, used, store and transfer different kinds of Personal Data about you which we have grouped together as follows.

- names, usernames or similar identifier, marital status, title, date of birth and gender;
- employment details, including name of employer, job title, employer's phone number;
- email address, postal address, residential address, phone numbers and other contact information;
- payment information such as credit or debit card numbers and bank account details;
- records of correspondences including email communications;
- technical data such as internet protocol address, login data, browser type and version, device type, model, MAC address, operating system, browsing history, other technology on the devices you use to access this website, capabilities and language, date and time of access of the site and the website from which you linked to our website;

- information about how you use our website, products and services;
- CCTV footage if you visit the Company's site or facilities, including access logs, image, video, audio, and license plates, amongst others;
- vehicle registration number and details recorded through an automatic number plate recognition system at the parking facilities of the Company's sites or facilities;
- marketing and communication data including your preference in receiving marketing from us and third parties and your communication preferences.

Minors (i.e., individuals under the age of 18) should not provide us with their Personal Data – it should be provided via their parent or guardian. Where we receive Personal Data relating to a minor, we will assume it has been appropriately provided.

We do not collect any special categories of Personal Data about you such as Sensitive Personal Data or Biometric Data (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.

3. **HOW IS YOUR PERSONAL DATA COLLECTED?**

We collect data from and about you including through the following:

- (a) Direct interaction: You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Data you provide when you:
- visit the Company's sites or facilities;
 - create an account on our website;
 - subscribe to our services or publications (including through alerts, media releases and updates);
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.

- (b) Automated technologies or interactions: As you interact with our website, we will automatically collect technical 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 at Clause 19 for further details. We also carry out automatic number plate recognition of the cars in the parking facilities of the Company's sites or facilities, through the automatic number plate recognition systems.

4. **HOW WE USE YOUR PERSONAL DATA**

We have set out below a description of the ways we may use your Personal Data.

- (a) To maintain and improve our website services as well as to develop new features to improve customer experience and support, marketing, authenticate users and send administrative messages. We may conduct trouble shooting, data analysis, testing, and research and to monitor and analyse usage and activity trends.
- (b) To enable the website to communicate with your computer or mobile device during website visits.
- (c) To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.
- (d) To register you as a customer.
- (e) To manage payments, fees and charges.
- (f) To manage our relationship with you including notifying you about changes to terms or cookie and privacy policy, or asking you to leave a review or take a survey.
- (g) To make suggestions and recommendations to you about goods or services that may be of interest to you.
- (h) To administer requests and feedback submitted through the website.
- (i) To maintain security and ensure public safety pursuant to our legitimate business interest.
- (j) To manage the parking facilities, have parking access control, and maintain security at our Company's sites and facilities, as well as to fulfil contractual duties effectively.
- (k) To comply with local law requirements.

- (l) For any other purposes disclosed to you at the time we collect the Personal Data or pursuant to your consent.

We may use your Personal 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 (marketing). You will receive marketing communications from us if you have requested information from us and you have not opted out of receiving that marketing. You can ask us, any time, to stop sending you marketing messaging.

5. **LAWFUL BASIS FOR COLLECTION AND PROCESSING PERSONAL DATA**

We will collect Personal Data only where it is sufficient, relevant, limited and necessary for specified, clear and legitimate purposes determined at the time of collection, unless we reasonably consider that we need to use it for another reason and that reason is similar or close to the original purpose. The processing of Personal Data shall be fair, transparent and lawful.

6. **DISCLOSURES OF YOUR PERSONAL DATA**

In connection with the purpose set out in Clause 5 of this Policy, we may share your Personal Data with other members of the Company's group for legitimate business-related purposes.

We may also share the Personal Data with vendors or third parties including those which appear on our website or which provide services to the Company, in order to allow the Company to fulfill orders, make deliveries, send e-mail, to manage customer lists, analyze data, provide marketing assistance, host websites, process card payments, and provide and improve customer service.

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the applicable law, including the UAE Laws.

We do not allow 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.

We shall disclose Personal Data to respond to court orders, legal process, law enforcement requests, legal claims or government inquiries, and to protect and defend the rights, interests, health, safety, and security of the Company, its users, or the public.

We may also share the Personal Data in connection with a transfer of assets, or if we are otherwise involved in a merger or transfer.

Subject to UAE Laws, we will get your express opt-in consent before we share your personal data with any third party for the purpose of allowing them to market their products and services to you. You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you.

7. **INTERNATIONAL TRANSFERS**

The Personal Data shared by you may be transferred outside the UAE. Whenever we transfer your Personal Data out of the UAE, we ensure that at least one of the following safeguards is implemented:

- (a) The country to which the Personal Data is transferred shall have legislations addressing Personal Data protection. This includes most significant provisions, measures, controls, stipulations and rules related to the protection of the privacy and confidentiality of your Personal Data, and your ability to exercise your legal rights; or
- (b) companies operating in countries where there are no laws for data protection, the Personal Data may be transferred under a contract or agreement obligating the companies in such countries to adopt measures, controls and requirements that are applicable in the UAE.

In countries where there are no legislations addressing Personal Data protection, Personal Data may also be transferred outside the UAE in the following cases:

- (a) If there is an explicit consent granted by you to transfer your Personal Data outside UAE, provided that such transfer shall not contradict the public or security interest of the State;
- (b) If the transfer is necessary to fulfil obligations and establish rights before judicial entities, exercise or defend the same;
- (c) If the transfer is necessary to sign or implement a contract made between us and you, or between us and third parties to serve your interests;
- (d) If the transfer is necessary to implement an action related to an international judicial cooperation; or
- (e) If the transfer is necessary to protect the public interest.

8. **DATA SECURITY**

We have put in place appropriate technical and regulatory measures to ensure the highest standard of information security that is suitable for the risks related to data processing undertaken, in order to protect your Personal Data from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. 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.

9. **DATA RETENTION**

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. The Personal Data may be kept if your identity has been concealed using the anonymization mechanism.

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.

10. **YOUR LEGAL RIGHTS**

You have rights under the UAE Laws in relation to your Personal Data. These include:

- (a) **Right to receive information:** You have the right to receive information regarding the type of Personal Data that is being processed, the purpose of processing, decisions made based on automated processing, including profiling and related information. You have the right to receive the Personal Data in an orderly and easily understandable manner.
- (b) **Right to request transfer of Personal Data:** You have the right to request the transfer of your Personal Data to another Controller whenever it is technically feasible.
- (c) **Right to correction or erasure of Personal Data:** You have the right to request correction of your inaccurate Personal Data or request to complete the data held by us. You may also have the right to request erasure of your Personal Data in certain cases, unless the

request is related to public health in private facilities, investigation procedures, or contradicting other legislations to which we are subject.

- (d) Right to stop processing: You may have the right to object to the processing of your Personal Data and stop it if the processing is intended for the purpose of direct marketing, including profiling related to direct marketing, or is intended for the purposes of conducting statistical surveys, unless the processing is necessary to serve the public interest or if it is not processed in accordance with the UAE Laws.

11. **HOW YOU CAN CONTACT US**

If you have any questions about this Policy, including any requests related to exercising your legal rights, you may contact us by email to OElmansy@albarakah.ae

12. **THIRD-PARTY LINKS AND CONTENT**

Many of the services set out on our website contain links to content that are maintained by third parties that we do not control. We are not responsible for the privacy practices of these third parties, and the information practices of these third parties are not covered by this Policy.

13. **CHANGES TO OUR POLICY**

We reserve the right to change this Policy from time to time. This Policy shall be reviewed and endorsed by the Company's board of directors. Any changes we make to this Policy will be done in compliance with the UAE Laws and will be posted on our website and date stamped so that you are always aware of the latest update.

14. **COOKIE POLICY**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

(a) **What is a cookie?**

A cookie is a small file of letters and numbers that a website stores on a visitor's computer or mobile device.

(b) **What cookies do we use?**

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- Analytical or performance cookies. These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose. The third parties' cookies used on our website are set out at **Annex** to this Policy.

(c) Accepting or Rejecting cookies

You can choose which analytical, functionality and targeting cookies we can set by clicking on the button(s):

- Strictly essential cookies OFF
- Analytical or performance cookies OFF
- Functionality cookies OFF
- Targeting cookies OFF

However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

(d) **Why do we use cookies?**

We use different types of cookies on our website for different reasons, but we primarily use cookies for technical reasons to improve the user experience, or for analytics of website traffic. Cookies can improve the user experience, for example, by storing user

preferences about our website.

The data we collect using cookies helps us understand our customers better so that we can provide a more focused user experience. By using the knowledge of your previous visits to our website we can enhance your subsequent visits by suggesting content to match your requirements.

15. GLOSSARY

This glossary sets out various terms we use in the Policy and what they mean. It doesn't matter if we use them capitalised or not.

Controller	An establishment or natural person that has Personal Data, and by virtue of its activity, determines whether individually or jointly with other persons or establishments, the method and criteria for processing such Personal Data and the purpose of processing it
Data Subject	A Natural Person who is the subject of Personal Data
Personal Data	Any data related to a specific natural person or related to a natural person that can be identified directly or indirectly by linking the data, through the use of identification elements such as his/her name, voice, image, identification number, his/her electronic identifier, his/her geographical location, or by one or more physical, physiological, economic, cultural or social characteristics. It includes Sensitive Personal Data and Biometric Data
Sensitive Personal Data	Any data which directly or indirectly reveals a natural person's family, ethnic origin, political or philosophical opinions, religious beliefs, criminal record, biometric data, or any data relating to such person's health and physical, psychological, mental, genetic or sexual condition, including information related to the provision of healthcare services to him/her which reveals his/her health status
Biometric Data	Personal Data resulting from processing using a specific technology related to the physical, physiological or behavioral characteristics of the Data Subject, which allows the identification or confirmation of the unique identification of the Data Subject,

	such as facial images or fingerprints
Processing	Any operation or set of operations performed on Personal Data using any electronic means, including processing and other means. This processing includes collecting, storing, recording, organizing, adapting, modifying, circulating, altering, retrieving, exchanging, sharing, using, characterizing, disclosing Personal Data by broadcasting, transmitting, distributing, making available, coordinating, merging, restricting, blocking, erasing or destroying it or creating forms thereof

Annex