

Privacy Policy

APPLICATION OF THIS PRIVACY POLICY

This Privacy Policy (“**Policy**”) forms part of the terms and conditions (“**Terms**”) relating to the use of the website www.jbdh.com provided by JB Drax Honore (DIFC) Limited (Hereafter referred as “**we**”, “**us**”, “**our**”). JB Drax Honore (DIFC) Limited is the data controller of any personal information provided to us, via this website or otherwise.

JB Drax Honore (DIFC) Limited is committed to safeguarding the privacy of the personal information that is provided to us or collected by us during the course of our business as well as the personal information we receive from you (“**User**”, “**you**” or “**your**”). This Policy, describes how and why we collect, store and use personal information, and provides information about your rights. Please read the following information carefully to understand our views and practices regarding how we handle personal information.

For the purposes of applicable data protection law, JB Drax Honore (DIFC) Limited is the “data controller” of your personal information.

COLLECTION OF PERSONAL INFORMATION

We may collect personal information from you through your use of the website, when you request information from us, when you engage us for legal services, or as a result of your relationship with any of our clients.

We may request, and collect from you, personal information and other information. Depending on the information or services you request, we may ask you to provide your name, phone numbers, address, email address, passport details, and other such personal information.

By providing us with any personal information, you are consenting to the use of your personal information as contemplated in this privacy notice. If you do not want us to use your personal information for any of these purposes, please do not provide us with your personal information.

In addition to the personal information you knowingly provide to us, with regard to each of your visits to our website , we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, location; browser plug-in types and versions, operating system; and

- Information about your visit; services you viewed or searched for; page response times, download errors, length of visits, page interaction information (such as scrolling, clicks, and mouse-overs).
- **Collection of Employee Monitoring Data** -The Company and its Group Companies hold and process both electronically and manually, Employee Monitoring Data (as defined below) (including Special Categories of Personal Data in addition to other information contained in Company e-mails (including e-mail attachments) which relates to the Employee for the purposes of the administration and management of its business and the Employee's employment by the Company. The Company and/or its Group Companies may transfer this data (including Personal Data) to other Company or Group Companies offices for storage, processing, or administrative purposes and/or legal/regulatory purposes or to third parties where such disclosure is required for the business purposes of the Company or any of its Group Companies or is necessary for administrative (including but not limited to data processing) purposes, employee management and/or legal and/or regulatory purposes.
- **Types of Employee Monitoring Data** -The Company reserves the right, for regulatory compliance purposes or otherwise, to occasionally monitor, review and access the Employee's telephone log, internet usage, voicemail, e-mail and/or other communication facilities on equipment or devices provided by the Company which the Employee may use during her employment. This may include covert monitoring.

PURPOSES

We will only use your personal information for our legitimate business purposes, including:

- To process and respond to inquiries, and provide our services;
- To manage our relationship with you and our clients;
- To market our services;
- To compile anonymous statistics, such as website usage statistics and statistics on the effectiveness of invitations and other emails; and
- Where otherwise required by law.

SHARING YOUR INFORMATION

We may disclose your personal information to a recipient (i) for the purposes of outsourcing one or more of the purposes-related functions described above; (ii) to confirm or update information provided by you; (iii) to inform you of events, information about our services, and other important information, or (iv) for other purposes disclosed at or before the time the information is collected.

If you tell us you wish to attend an event, your name and organization may appear on a list which we provide to other delegates at the event. We also take photographs and video of our events, and this may result in your image being captured and used in the course of reporting on the event (e.g. via social media or other means).

In relation to any other third parties we will only disclose your information where you have given your consent or where we are required to do so by law, or where it is necessary for the purpose of, or in connection with legal proceedings or in order to exercise or defend legal rights.

CROSS-BORDER TRANSFER OF YOUR INFORMATION

It may sometimes be necessary for us to share your personal information with other Entities around the world or for such JB Drax Honore (DIFC) Limited offices to share your information with Partner Offices in the DIFC. It may also be necessary for us to share your personal information with associated professional services firms around the world, who provide services to us or on our behalf (including data storage facilities or online storage located within or outside the United Arab Emirates, which may be operated by independent service contractors). This will entail a transfer of personal information from within the Dubai International Financial Centre to recipients outside the DIFC, and vice versa.

The level of personal information protection in locations outside DIFC may be less than that offered within the DIFC or the country in which you reside and may not be recognized as providing an adequate level of protection, but we have procedures in place to ensure the protection of personal information. These procedures include putting steps in place to ensure that all such entities keep your personal information confidential and secure and only use it for the purposes that we have specified and communicated to you. When we transfer your information to other countries, we will use, share and safeguard that information as described in this privacy notice. We only transfer personal information to these countries, with your consent, when it is necessary for the services we provide you, or subject to appropriate safeguards that assure the protection of your personal information, such as standard contractual clauses.

YOUR RIGHTS

Under certain circumstances, you have the following rights:

- **Access and Accuracy:** the right to ask us to provide you, or a third party, with copies of the personal information we hold about you at any time and to be informed of the contents and origin, verify its accuracy, or else request that such information be supplemented, updated or rectified in accordance with the applicable law;
- **Erasure or Blocking:** the right to request erasure, anonymization or blocking of your personal information that is processed in breach of the law;
- **Objecting:** the right to object on legitimate grounds to the processing of your personal information. In certain circumstances we may not be able to stop using your personal information, if that is the case, we'll let you know why;
- **Porting:** the right to request that some of your personal information is provided to you, or to another data controller, in a commonly used, machine-readable format;
- **Complaints:** if you believe that your data protection rights may have been breached, you have the right to lodge a complaint to the applicable supervisory or data protection authority; and
- **Withdraw consent:** when personal information is processed on the basis of consent an individual may withdraw consent at any time. In the event that you no longer want to receive any marketing material from us, please use the unsubscribe option (which is in all of our marketing emails to you), or contact us on the details set out below.

If you would like to exercise any of the above rights, please contact us at globalcompliance@jbdh.com

CONFIDENTIALITY

The information you provide may be confidential, and we will maintain such confidentiality and protect your information in accordance with this privacy notice, our professional obligations and applicable law. We do not sell, rent, distribute, or otherwise make, personal information commercially available to any third party. We may share information with our service providers for the purposes set out in this privacy notice.

INFORMATION SECURITY

We have implemented reasonable administrative, technical and physical measures to protect your personal information against loss, misuse and alteration.

HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We will retain your personal information for the length of time needed to fulfil the purposes for which it was collected (as outlined in this Policy) unless a longer retention period is required or permitted by law.

Your personal information that is processed for marketing purposes will be stored until you exercise the right to withdraw consent, and once such right is exercised, your personal information will be kept only during the applicable statute of limitations period for any disputes or liabilities that may arise as a consequence of the processing of that information (which is up to 15 years in the UAE). Once potential actions are time-barred we will proceed to delete the personal data. In any other circumstances, we will only retain your personal information for a shorter or longer period as required by any applicable law.

CHANGES TO THIS PRIVACY POLICY

We may from time to time make changes to this Policy. Please check back regularly to keep informed of updates to this Policy. These changes are effective immediately, after they are posted on www.jbdh.com

CONTACT DETAILS

If you have any questions about this Policy, or our processing of your personal data, please contact us on globalcompliance@jbdh.com