



Al Taresh

Personal Data Protection and Privacy Policy

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1. Administrative provisions

Distribution: All Personnel

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2. Executive summary

This Personal Data Protection and Privacy Policy ("Policy") supports and builds upon provisions within Al Taresh Code of Conduct ("the Code") regarding respecting and protecting personal information, in accordance with local law and professional standards. Encompassed within the Code and this Policy is our obligation to comply with applicable data protection legislation.

The obligations set out in this Policy must be understood in the context of the provision of the Code that states that we comply with laws, regulations and standards that apply to us in our professional conduct. Accordingly, to the extent any applicable law, regulation or standard is either more restrictive than, or imposes duties beyond this Policy, the local law, regulation or standard shall govern.

3. Responsibility for the Policy

Legal is responsible for the Governance, Risk and Compliance ("GRC") at Al Taresh and is responsible for the implementation of this Policy.

4. Application

This Policy applies to all Al Taresh Personnel and relates to the processing of personal data of current, past and prospective Al Taresh Personnel, clients, suppliers, sub-contractors and any other third parties wherever it is processed as part of the business activities of Al Taresh.

5. Definitions

For purposes of this Policy:

- "Al Taresh Personnel" means Al Taresh partners, principals, executive directors, directors, employees, new hires, individual contractors and temporary staff.
- "Personal Data" is any information relating to an identified or identifiable natural person; an identifiable person is one who can be directly or indirectly identified by an identifier (such as name, identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person).
- "Processing" of Personal Data means any operation which is performed on Personal Data, whether or not by automated means, such as collection, recording, storage, access, alteration, transmission, porting, retrieval or deletion of Personal Data.
- "Sensitive Personal Data" means special categories of personal data (personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation), personal data relating to criminal convictions



and offences as well as data that may facilitate identity theft or payment fraud (like social security files, financial account numbers, credit card details and government identification numbers).

- “Personal data breach” means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data.
- “Pseudonymization” means the processing of Personal Data in such a manner that the Personal Data can no longer be attributed to a specific individual without the use of additional information, provided that such additional information is kept separately and is subject to measures so that the Personal Data are not attributed to an identified or identifiable natural person.
- “Privacy and Confidentiality Impact Assessment” means a process to describe, assess the necessity and proportionality of, and help assess and address risks to the rights and freedoms of natural persons resulting from the processing of Personal Data.

6. Al Taresh professionals’ responsibilities with regard to personal data protection

6.1 General principles

When Al Taresh Personnel Process Personal Data, they must work within the following principles:

- only process Personal Data lawfully, fairly and in a transparent manner;
- collect Personal Data for specified, explicit and legitimate purposes;
- not process Personal Data in a manner that is incompatible with those purposes;
- Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (data minimization);
- Keep Personal Data accurate and, where necessary, up-to-date;
- Keep Personal Data only in a form which permits identification of an individual for as long as is necessary for the purposes for which the Personal Data are Processed; and
- process Personal Data in a secure manner (protected against unauthorized or unlawful processing and against loss, destruction or damage).

Al Taresh Personnel must also comply with the requirements contained in Al Taresh policies such as those referred to in Section 2 above.

6.2 Sensitive personal data

Sensitive personal data should be processed with additional care.

Al Taresh Personnel must avoid the processing of Sensitive Personal Data where it is not required for the purposes for which the data is collected (or subsequently processed) and limit access to appropriate persons (by either masking or making the Personal Data anonymous or pseudonymous, where appropriate).

6.3 Honoring individual’s rights

When Al Taresh Personnel receive a request from an individual who would like to be informed about whether Al Taresh is processing the individual’s Personal Data, the **data protection leader** should be informed without undue delay. The same applies to requests to provide access to, correct, delete, port (i.e. transfer to a new service provider), or restrict the processing of, Personal Data. The data protection team should advise about the appropriate steps to handle the request.

If Al Taresh Personnel would like to obtain confirmation as to whether or not, and what, Personal Data is processed by Al Taresh about them, they should contact the **data protection leader** or the **HR team** via email.

6.4 International data transfers

In some cases, data protection laws do not permit the transfer of Personal Data from one country to another unless certain conditions are met. For instance, European Union ("EU") data protection rules generally do not allow the transfer of personal data to countries outside the European Economic Area ("EEA") that are not considered to provide an adequate level of data protection.

Al Taresh Personnel who transfer Personal Data within the Al Taresh network should adhere to the Rules in this policy. Otherwise, Al Taresh Personnel should consult with the **data protection leader**.

6.5 Personal Data breaches

Al Taresh Personnel should act promptly (as soon as possible but in no more than 12 hours) when an actual or suspected Personal data breach becomes known. Prompt action includes notifying the team leader and the data protection leader. Al Taresh Personnel should work with the data protection leader and follow the recommended guidance. Only the legal and data protection team or other authorized Al Taresh Personnel are allowed to contact individuals or entities outside of Al Taresh with regard to Personal data breaches.

The data protection team will liaise with relevant parties to collect relevant information, gain an accurate picture of the personal data breach, identify any regulatory or contractual requirements, and assist with any appropriate notifications to clients, regulators or others.

6.6 Direct Marketing

Where Personal Data is processed for the purposes of direct marketing, Al Taresh Personnel must respect any request made by an individual to cease using his or her Personal Data for this purpose. Al Taresh Personnel must honor opt-out requests.

6.7 Automated individual decisions

Al Taresh Personnel should make sure that any decision that meaningfully affects an individual shall not be based solely on the automated processing of that individual's Personal Data (including profiling), unless such decision is: (i) necessary for entering into, or performance of, a contract between the individual and Al Taresh; or (ii) authorized by law; or (iii) based on the individual's explicit consent.

7. Controller or Processor

The law in the EU and certain other countries differentiates between a "controller" and a "processor" for purposes of processing Personal Data. The controller is the organization which, alone or jointly with others, determines the purposes and means of the processing of Personal Data. The processor is the organization which processes Personal Data on behalf of a controller. For the majority of services that Al Taresh provides to clients, Al Taresh is acting as a controller, dealing with Personal Data in accordance with its own strict professional obligations. For a limited type of services, Al Taresh will be processing data as a processor on behalf, and under the instructions, of a client. Al Taresh entities may also be acting as a processor in providing internal services, such as performing checks in compliance with regulatory and legal obligations, undertaking risk management and quality reviews and for internal financial accounting, information technology and other administrative support services.

8. Data Protection Officer (DPO)

The DPO shall have complete visibility related to privacy breach management, privacy impact assessment, privacy complaints and grievances. The DPO shall be supported in performing his or her tasks, with both resources and

access to information. The DPO shall directly report to the highest management level of the controller or the processor. The DPO contact details shall be easily available to all the data subjects to connect directly all issues related to processing of their Personal Information.

The Data Protection Officer shall undertake following responsibilities:

- To inform and advise the organization and its employees about their obligations to comply with the data privacy and other data protection laws;
- To provide inputs for drafting of privacy policies and related documentation;
- To monitor compliance with the Al Taresh data privacy policy and other data protection laws;
- To be the first point of contact for supervisory authorities and for data subjects whose data is processed (employees, customers etc.);
- Educating the company and employees on important compliance requirements;
- Training staff involved in personal data processing;
- Ensure Identification, registration and communication with supervisory authority;
- Conducting reviews to ensure compliance and address potential privacy issues proactively;
- Monitoring performance and providing advice on the impact of data protection efforts;
- Maintaining comprehensive records of all data processing activities conducted by the company, including the purpose of all processing activities, which must be made public on request;
- Interfacing with data subjects to inform them about how their data is being used, their rights to have their personal data erased, and what measures the company has put in place to protect their Personal Information;
- Serve as a supervisor for all the compliance officers of privacy and enforce privacy policies and recommended practices;
- Supporting in providing response to information requests related to privacy matters;
- Support in allocating required resources and skills for conducting periodic privacy reviews; and
- Review and approve the prioritization plan for implementation of privacy initiatives

9. Escalation and exceptions

Any conflicts or disagreements or exceptions relating to requirements under this policy or other conflicts or disagreements that relate to data protection matters should be referred to the data protection leader for resolution in the form of a Complaint.

10. Procedures for making a Complaint

A "complaint" is any written or verbal expression of dissatisfaction with services offered by AL Taresh. Any such complaint is taken seriously and treated with appropriate professional attention and dealt with in accordance with this Policy.

10.1 A complainant must follow the procedures set out below:

- (a) The attached complaints form ("Complaints Form") must be completed, dated, and signed by the complainant.
- (b) The completed, signed and dated Complaints Form must be sent to Al Taresh by one of the following methods:
 - In person at Al Taresh offices;
 - By fax to: [*];
 - By post to: [*];
 - By e-mail to: [*]



- (c) If a complainant is not able to complete a Complaints Form, he or she may obtain the assistance of another person to complete it.

The telephone lines of the Employees who work at AL Taresh may be recorded in order to enable AL Taresh to improve its services. If a complaint is received by telephone, Employees shall log the complaint, however, the complainant will still be required to complete the Complaints Form. This process ensures that AL Taresh has all the required information with which to review the complaint, and avoids any potential misunderstandings that could occur during verbal communications.

Complaints will not be accepted more than 6 months after the date of events about the subject matter of the complaint, or more than 6 months after the complainant became aware of the cause for complaint, if this is later. Exceptions to this rule may be made by AL Taresh, taking into account the reasons for the delay and the practicability of investigating the matter. Where AL Taresh permits additional time for the investigation of the matter, the overall limit for dealing with the complaint will be subject to a final limit of 12 months.

10.2 Procedures for reviewing a complaint

On receipt of a completed and signed Complaints Form, the same will be time-stamped, to record the date and time of receipt and immediately send it to the Legal Department.

A written acknowledgement of receipt will be sent to the complainant within two business days and which will also be communicated by email or by telephone depending on the contact method selected by the complainant on the Complaints Form.

Following investigation of the complaint, by reference to the date of receipt of a completed and signed Complaints Form:

- a) a substantive response will be provided to the complainant within 5 business days where the matter is straight forward;
- b) if the matter requires more than 5 business days to review, a letter will be sent to the complainant informing him of the status of the review and the additional steps that are required or information awaited;
- c) a substantive response will be provided the complainant within a maximum period of 29 days. If, in exceptional circumstances, this timeframe cannot be met, the reasons shall be provided in writing to the complainant and a meeting offered to discuss the reasons, progress and status.

A substantive response means, a full response setting out the outcome of the investigation into the complaint and the Company's decision on whether the complaint is upheld or rejected. Where a complaint is upheld, the manner in which the complaint has been, or will be, addressed shall be specified.

Where a complaint is rejected, the reasons for such rejection shall be specified. The complaint shall thereafter be deemed to be closed.

Investigation of each complaint is overseen and coordinated by a member of the Legal Department and involves input from all relevant Employees who have dealt with the matters that are the subject of the complaint, and who are required to review the matter having regard to their role within AL Taresh. The outcome of the investigation shall be recorded by a member of the Legal Department by completion of a Complaint Review Form.

On an annual basis, AL Taresh analyses statistics of complaints received by AL Taresh to:

- (a) identify areas for improvement in AL Taresh procedures and services;



- (b) determine the continued effectiveness of this Policy;
- (c) determine trends in complaints and to the reasons for any increase in the number of complaints.

11. Complaints Form

This form is to be completed by the Complainant who wishes to lodge a complaint regarding the services provided by Al Taresh or a specific subject matter.

SECTION 1 – INFORMATION ABOUT THE COMPLAINANT			
1.1	Full name of complainant:		
1.2	Address:		
1.3	Mobile Number:		
1.4	Email address (if available):		
1.5	Fax Number (if available):		
1.6	Train Number (if relevant and known):		
1.6	Journey details:		
1.7	Name of person completing this form and relationship to the person named in section 1.1 (applicable only if the person completing this form is not the person named in section 1.1. above):		
1.8	Acknowledgement of this complaint and responses will be in writing. Please specify the other methods of contact you prefer in handling this complaint (place a X against your preference):	The address in section 1.2	
		The email address in section 1.4	
		The fax number in section 1.5	
		Any of the above methods	

SECTION 2 – DETAILS OF THE COMPLAINT	
Provide as much information as is possible about the cause of the complaint. Cover all information including what happened, how it happened, dates, location, names, what information and documents you provided and were provided to you and attach all relevant documents referred to.	



SECTION 3 – DECLARATION & SIGNATURE

Kindly read the declarations below carefully and sign where indicated

3.1	I confirm that I am the person named in section 1.1 of this form and have completed this form. I further that the information I have provided in the form is accurate and complete to the best of my knowledge.	<p>.....</p> <p>Signature</p>
3.2	I confirm that I am the person named in section 1.7 who has completed this form for the person named in section 1.1 and that it accurately reflects the information provided to me by him/her. I further confirm that I have explained to him/her the statements made in this form.	<p>.....</p> <p>Signature</p>