

Privacy Policy

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Dubai - UAE

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Responsibility

This Privacy Policy is provided by Finvizier Consultancies FZCO (Service License No. DMCC-858773 of Office 1607, Saba 1, Cluster E, JLT, Dubai, United Arab Emirates; “**Finvizier Consultancies FZCO**”, “**we**”, “**us**”, “**our**”), for and on behalf of itself and, where applicable, other entities operating under the Finvizier Consultancies brand within the Middle East. This Privacy Policy has been prepared with reference to the applicable data protection laws of the United Arab Emirates, including Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (PDPL), together with any applicable implementing regulations, as amended from time to time. Where we process personal data that is subject to the laws of another jurisdiction, we will process such data in accordance with the applicable legal requirements of that jurisdiction where required

We are committed to safeguarding the privacy of the personal information that we process in the course of our business, including the personal information we receive from you (“**you**” or “**your**”). This Privacy Policy describes how and why we collect, store and use personal information, and provides information about the rights of the individuals to whom such personal information relates.

For the purposes of this Privacy Policy, "Personal Information" or "Personal Data" means any information relating to an identified or identifiable natural person.

For the purposes of applicable data protection laws, Finvizier Consultancies FZCO will generally act as the Controller of the Personal Information processed under this Privacy Policy. Specifically, your Personal Information will be controlled by the Finvizier Consultancies FZCO entity that you have instructed, or that is providing services to or communicating with you. In certain circumstances, where required by applicable law or contractual arrangements, we may act as a Processor on behalf of our clients, processing Personal Information only in accordance with their documented instructions or as otherwise permitted or required by law.

Please read the following information carefully to understand our views and practices regarding how we handle personal information. Any privacy-related enquiries, requests to exercise data subject rights or complaints regarding the processing of Personal Information should be directed to our Head of Compliance & Quality using the contact details provided at the end of this Privacy Policy.

Collection of Personal Information

We may collect Personal Information from you in the course of our business, including when you contact us, request information, instruct us to provide consulting or other professional services, use our website or other digital platforms, attend our events, or otherwise interact with us in connection with our business activities. The personal information that we process includes:

- Basic details, such as your name, role/title, employer/s, your relationship to a person, and your contact information (such as your email address, physical address, contact numbers);
- Identification information to enable us to check and verify your identity (e.g. your birthdate; your passport details), and information collected from publicly available resources to verify the same;
- Compliance information, including information required for know-your-client (KYC), anti-money laundering (AML), sanctions screening, conflict checks and other regulatory or compliance purposes where required by applicable law;
- Information relating to the matter on which you are seeking our consulting services;
- Bank account or other financial information, if relevant to our engagement with you;
- Business communications, including correspondence, meeting notes, records of telephone calls, video conferences and other communications exchanged with you;
- Technical information (including your location, IP address, browser details, traffic data, location data), such as information from your visits to our website (page interaction information, length of visits, etc.), or in relation to marketing emails we send to you;
- Device and usage information, including device identifiers, browser settings, operating system information, cookies, log files and similar technologies used when you access our website or online services;
- Information relating to your visits to our office or our meetings and events, including appointment details (e.g. time, location, participants), CCTV images and other photographic or video images;
- Personal information provided to us by or on behalf of our clients, or generated by us in the course of providing services to them, which may include special categories of personal data;
- Information obtained from publicly available sources, professional networking platforms, corporate registries or other lawful sources where relevant to our services or legal obligations;
- Any other information relating to you which you may provide to us.

We may collect your personal information in the following circumstances:

- As part of our business intake and client on-boarding or when you seek consulting services from us;
- When you seek employment from us, as part of our new employee on-boarding and maintenance of the employment relationship;
- When you provide (or offer to provide) services to us, either yourself or on behalf of your employer;
- When we are acting on a matter where you or your employer are a party to the same;
- When you interact with our website, or use any of our online services;
- When you interact with us in respect of any of our marketing communications or events;
- When we carry out compliance, due diligence, conflict checking or regulatory verification processes;
- When information about you is provided to us by our clients, business partners or professional advisers in connection with our services.

We collect most of this information directly from you or through your use of our website and online services. In certain circumstances, we may also obtain Personal Information from third-party sources, including our clients, your employer, professional advisers, business partners, publicly available sources, regulators, government authorities, credit reference agencies, technology providers and other lawful sources, where permitted by applicable law. The information you provide may be confidential, and we will maintain such confidentiality and protect your information in accordance with our professional obligations and applicable law. We treat Personal Information as confidential and implement appropriate contractual, organizational and technical measures to protect it. Where Personal Information is processed by our employees, contractors or third-party service providers, we require them to maintain appropriate confidentiality obligations and to process such information only for authorized purposes and in accordance with applicable law.

Purposes

Whether we receive your Personal Information directly from you or from a third party, we will process it only where we have a lawful basis to do so under applicable data protection laws. Depending on the circumstances, this may include your consent (where required), the performance of a contract or taking steps at your request prior to entering into a contract, compliance with our legal or regulatory obligations, the protection of your vital interests or those of another individual, the establishment, exercise or defense of legal claims, or where processing is necessary for our legitimate business interests, provided that such interests are not overridden by your fundamental rights and freedoms. The purposes for which we process your personal information are as follows:

- Providing consulting, advisory, compliance and other professional services requested by you or your organization;
- Communicating with you regarding our services, business developments, publications, events, newsletters and other marketing communications, where permitted by applicable law;
- Managing and administering our business relationship with you (or your organization), whether in connection with the provision of our consulting services, the procurement of your goods and services, or as your employer (or potential or former employer), including processing payments, accounting, auditing, billing and collection and related support services;
- Complying with applicable legal, regulatory and professional obligations, including anti-money laundering, counter-terrorist financing, sanctions screening, know-your-client procedures, conflict checks, fraud prevention, audits, investigations and enquiries by competent authorities; ng accurate and up-to-date contact records using information provided by you or obtained from lawful sources.
- Conducting internal administration, governance, reporting, quality assurance, training and business planning activities;
- Performing internal risk management, legal compliance, conflict checking, due diligence and audit activities;
- Exercising or defending our legal rights, responding to legal proceedings, regulatory requests or law enforcement requirements;
- Improving, developing and maintaining our services, website, systems and business processes, including through analytics and statistical reporting using aggregated or anonymized information where appropriate;
- Protecting the rights, property, safety and legitimate interests of Finvizier Consultancies FZCO, our clients, employees and business partners;
- Any other purpose that is compatible with the original purpose for which the Personal Information was collected, or which is otherwise permitted or required under applicable law.

Client Relationship Management

We operate a Client Relationship Management email mailing list program, which we use to inform clients and other contacts about our services, including our publications and events. Such communications messages may contain technologies that enable us to measure engagement (such as email opens and link clicks) in order to improve our communications and maintain accurate communication preferences, in accordance with applicable law.

If you would like to cease receiving marketing materials from us at any time, you may unsubscribe by following the instructions contained in our marketing communications, update your communication preferences where available, or contact us using the contact details provided in this Privacy Policy. Please note that even if you opt out of receiving marketing communications, we may continue to send you communications relating to our services, legal obligations or our ongoing business relationship with you where appropriate.

Cookies

Cookies are small text files that are placed on your device by a website or web server when you visit our website. Cookies enable a website to recognize your device, remember your preferences and improve your browsing experience. Information from cookies may include information relating to your use of our websites, information about your computer (such as IP address and browser type), and demographic data. We use cookies to improve our website.

Where required by applicable law, we will obtain your consent before placing non-essential cookies on your device. You may manage your cookie preferences through your browser settings or any cookie management tools made available on our website.

Specifically, we use Google Analytics, and other similar analytics tools to track unique visitors to our website and app (storing a unique visitor ID, the date and time of first visit, the time their current visit started and the total number of visits they have made); to register session details (so as to attribute visit information, including conversions and transactions to a traffic source); and to register that a website visit has ended and the browser closed. Most internet browsers allow you to manage, reject or disable cookies through your browser settings (if you wish to do so).

Children's Privacy

Our website and professional services are not directed to children, and we do not knowingly collect Personal Information from individuals under the age required by applicable law without appropriate legal authority or parental consent where required.

Sharing your Personal Information

We may disclose your personal information to a recipient (i) for the purposes for the purposes of outsourcing one or more of the processing activities 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 we reorganize or restructure our business, we may need to transfer your personal information to other group entities or to third parties.

We require all third parties processing Personal Information on our behalf to implement appropriate security measures and to process such information only in accordance with applicable law and our instructions.

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); we will draw this to your attention in materials relating to the specific events.

In relation to any other disclosures to third parties as necessary to provide the services as effectively as we can, we will only do so where permitted or required by applicable law, including where you have given your consent (where required), where disclosure is required by law, or where it is necessary for the purpose of or in connection with legal proceedings or in order to establish, exercise or defend legal rights. We do not sell, rent, distribute, or otherwise make, personal information commercially available to any third party.

In addition, we make use of third-party technology services including, amongst other things, cloud security systems. The use of these services may require your personal information to be held in the cloud on infrastructure managed by the relevant service provider.

International Transfers of Personal Information

We operate internationally and may transfer Personal Information to recipients located outside the United Arab Emirates where necessary for the purposes described in this Privacy Policy, including to our professional advisers, service providers, technology providers and business partners.

Where Personal Information is transferred internationally, we will implement appropriate safeguards as required by applicable data protection laws to ensure that such Personal Information remains adequately protected.

How long we keep your Personal Information

We will retain your personal information as long as necessary to fulfil the purposes for which it was collected, taking into account legal, regulatory and professional retention obligations, unless a longer retention period is required or permitted by applicable law, or we have agreed a longer retention period with you.

Your Rights

Various rights may be available to you, depending on the circumstances and the applicable law. We summarize key rights likely to be available to most data subjects:

- **Withdraw consent:** Where personal information is processed on the basis of consent, you may withdraw consent at any time. Such withdrawal will not affect the lawfulness of processing carried out prior to the withdrawal.
- **Access and rectification, etc.:** You may request access to and rectification or erasure of personal information, request the restriction of processing, object to the processing of your Personal Information, and, where applicable, exercise your right to data portability.;
- **Objecting and restricting:** You may object, on legitimate grounds, to the processing of your personal information, or request that processing be restricted; and
- **Complaints:** If you believe that your data protection rights may have been breached, you may lodge a complaint with the relevant data protection authority (e.g. the Commissioner of Data Protection in the case of the DMCC).

If you would like to exercise any of the above rights, or any other rights available to you pursuant to applicable law, please contact our HEAD of Compliance & Quality using the contact details set out below.

Information Security

We have implemented appropriate administrative, technical and physical measures to protect your Personal Information against loss, misuse, unauthorized access, disclosure, alteration and destruction.

Changes to this Privacy Policy

We may from time-to-time update to this Privacy Policy. Where these are likely to be material, we will communicate them in advance. Otherwise, these will become effective once the amended Privacy Policy is posted on our website. Please check our website regularly to stay informed of any updates to this Privacy Policy.

Contact Details

If you have any questions about this Privacy Policy, or our processing of your Personal Information, please contact our Head of Compliance & Quality using the contact details set out below:

Head of Compliance & Quality

Finvizier Consultancies FZCO

Office 1607, Saba 1, Cluster E, JLT,

Dubai,

United Arab Emirates

Email: info@finvizier.com

Telephone: +971 4 541 5200