

## AL MANARAH INSURANCE SERVICES CO. LLC

### PRIVACY NOTICE

#### INTRODUCTION

AL MANARAH INSURANCE SERVICES CO. LLC and its branches collectively, ("We", "Us", "Our", "Al Manarah") value your privacy and are committed to safeguarding your personal information.

This Privacy Notice outlines Our practices regarding the collection, use, retention, disclosure, and protection of the personal data of Our website users in line with UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data and any amendments or implementing regulation thereof (the "PDPL"), and any other applicable data protection laws and regulations (together the "Data Protection Law").

This Privacy Notice does not cover third-party websites, applications, or portals that link to or from AL Manarah's website, or websites that have distinct privacy notices.

If you supply Us with personal data about others, you are required to share this Privacy Notice with them and obtain any necessary consents for processing their data as described in this Privacy Notice.

#### 1. WHO WE ARE

AL MANARAH INSURANCE SERVICES CO. LLC is an insurance broker incorporated in the United Arab Emirates, Sharjah, with Trading Register Certificate number 212133 and licensed by the Central Bank of the UAE (CBUAE) to carry out insurance brokerage activities in accordance with applicable UAE laws and regulations under License number 047.

As an insurance broker, We may collect Personal Data from you for specific purposes in line with Our licensed activities and the services We provide (the "Services").

#### 2. WHAT IS PERSONAL DATA?

Personal Data means any information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to identifiers such as a name, identification number, online identifier, or one or more factors specific to their physical, physiological, economic, cultural, or social identity.

Sensitive Personal Data means Personal Data that reveals or relates to a person's health, physical or mental condition, genetic data, biometric data, religious or philosophical beliefs, political opinions, criminal records, or any other data deemed sensitive under applicable Data Protection Law.

#### 3. INDIVIDUALS COVERED BY THIS PRIVACY NOTICE

This Privacy Notice provides information for those individuals whose Personal Data We process, including:

- **Business-related contacts** such as brokers, insurers, service providers, suppliers and government officials.
- **Customers and individuals linked to Our insurance operations**, such as insured persons, prospective and existing customers, beneficiaries, claimants, and others connected to insurance policies or claims.
- **Users of Our website.**

▪ **Other individuals**, such as those who interact with Our marketing materials, submit enquiries, or whose Personal Data is otherwise processed in the ordinary course of Our business.

#### **4. WHY DO WE COLLECT YOUR PERSONAL DATA?**

We collect and process your Personal Data as a data controller to provide insurance brokerage and related services in accordance with applicable laws and regulations.

We process your Personal Data to provide insurance advisory and brokerage services, including placing insurance policies with insurers, and supporting policy administration and claims handling.

We may not be able to provide or fully deliver certain services if you do not provide the requested Personal Data. This may affect Our ability to assess your insurance needs, place policies, or assist you with claims effectively.

Where information is mandatory, we will inform you at the point of collection.

We may process Personal Data for the following purposes that are inherent to Our services:

- To provide insurance advisory and brokerage services, including recommending suitable insurance products, and placing policies with insurers.
- To handle policy applications and related administrative processes, including correspondence, invoicing and record keeping.
- To assist you in connection with insurance claims, including notification to insurers and ongoing communication during the claims process.
- To receive, investigate, and respond to complaints and feedback.
- To conduct onboarding checks, including AML/CFT and other regulatory compliance requirements.
- To detect, investigate and prevent fraud.

We may also process your Personal Data:

- To respond to enquiries and improve Our customer service;
- For analytics and service improvement purposes, using aggregated or de-identified data where reasonably possible;
- To develop and maintain internal tools, systems, and databases;
- To comply with legal, regulatory, audit, and security obligations;
- To support corporate transactions such as mergers, acquisitions, or reorganisations, where applicable;
- For marketing and promotional purposes, where permitted by applicable law. You may opt out of marketing communications at any time.

Where required by applicable law, we will inform you if we need to use your Personal Data for purposes that are materially different or incompatible with those stated above and, where necessary, obtain your consent in a clear and explicit manner.

Where We provide Services in relation to health or medical insurance, We may process Personal Data that includes health-related information. Such data is classified as Sensitive Personal Data. We will only process such information where it is necessary for the provision of the relevant Services and where we have

obtained the explicit consent of the individual, where required under applicable Data Protection Law. If such consent is not provided, we may be unable to provide the requested Services. All processing is carried out in accordance with applicable Data Protection Law and subject to appropriate technical and organisational safeguards for Sensitive Personal Data.

## 5. HOW DO WE COLLECT YOUR PERSONAL DATA?

We may collect your Personal Data in the following ways:

- **Directly from you or your authorised representatives**, when you contact Us or use Our Services, including via email, telephone, our websites or other communication channels.
- **During our interactions with you**, including when We respond to enquiries or request additional, missing, or updated information in connection with your insurance needs or transactions.
- **From clients and business partners**, including insurers, brokers, employers, and other service providers involved in the provision of insurance-related services.
- **From publicly available sources**, where relevant to the Services We provide.
- **From companies within Our corporate group or affiliates**.
- **From government authorities and regulatory bodies**, including law enforcement agencies where applicable.
- **From third-party verification and screening tools**, including fraud prevention databases, credit reference agencies, and sanctions screening systems.
- **From other third parties**, where lawful and relevant to the Services We provide.

Where required by applicable law, We will seek your consent for the collection, use, or disclosure of your Personal Data. This may include situations involving Sensitive Personal Data, marketing communications, or new purposes not originally disclosed. Consent may be obtained through affirmative actions such as ticking a box or agreeing to terms.

## 6. WHAT TYPE OF DATA DO WE COLLECT FROM YOU?

We may collect and process the following categories of Personal Data:

- a. **Personal and identification data**, such as name, contact details, date of birth, nationality, marital status, and family and dependent details.
- b. **Government and identity data**, such as national identification numbers, passport details, visa information, tax identifiers, driving licence details, and copies of official documents.
- c. **Employment and professional data**, such as job title, employer and employment status where relevant.
- d. **Insurance and underwriting data**, such as policy details, coverage information, premiums, eligibility, risk profile, policy changes, and underwriting history.
- e. **Claims-related data**, including claims history, claim details, supporting documentation, and information relating to insured events, where applicable.
- f. **Financial and transactional data**, such as payment information and records of products or services considered or purchased.

g. **Special category and Sensitive Personal Data**, including health-related information, data relating to health, genetic or biometric data, and other sensitive information such as racial or ethnic origin, religious or philosophical beliefs, political opinions, or sexual orientation, where relevant to the insurance Services We provide.

h. **Background, compliance, and screening data**, including sanctions screening results, politically exposed person (PEP) status, and criminal record information where required for regulatory compliance.

i. **Marketing and preference data**, such as your communication preferences and consent status.

j. **Technical and usage data**, such as IP address, device information, browser type, operating system, website usage data, cookies, or similar tracking technologies.

## 7. LAWFUL BASIS FOR PROCESSING PERSONAL DATA

We process your Personal Data on one or more of the following lawful bases, as permitted under applicable Data Protection Law:

a. **Consent**: where you have given your explicit consent, particularly for the processing of Sensitive Data or for specific purposes such as marketing communications, where required under applicable laws.

b. **Contractual necessity**: where processing is necessary to take steps at your request prior to entering into a contract, or to perform Our obligations under a contract with you, including providing insurance brokerage services.

c. **Legal obligation**: where We are required to process your Personal Data to comply with applicable laws and regulatory requirements.

d. **Vital interests**: where processing is necessary to protect your vital interests or those of another individual.

e. **Legitimate interests**: where processing is necessary for Our legitimate business interests or those of a third party, such as fraud prevention, service improvement, system security and efficient business operations, provided such interests are not overridden by your rights and interests.

## 8. FOR HOW LONG DO WE COLLECT YOUR PERSONAL DATA?

We will store your Personal Data in compliance with the data minimisation and storage limitation principles under applicable Data Protection Laws.

We will keep your Personal data for as long as it remains necessary for the purposes mentioned in the present Privacy Notice or as required by law, including regulatory retention periods applicable to insurance and AML/CFT obligations, which may extend beyond the termination of Our relationship with you. We may retain certain data as necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-personally identifiable data or if required by law. All retained Personal Data will continue to be protected in accordance with this Privacy Notice.

If you request that certain Personal Data be removed from Our databases, it may not be possible to completely delete all your Personal Data due to system constraints such as backup retention cycles or legal and regulatory constraints.

## **9. SHARING OF YOUR PERSONAL DATA**

We may share your Personal Data with Our affiliates, employees, agents, and authorised representatives for internal business purposes, including administrative, legal, audit, and billing in accordance with this Privacy Notice. Some recipients may act as independent data controllers, while others act as data processors processing Personal Data strictly on Our instructions.

Where we share Personal Data for marketing purposes, we will do so only in accordance with applicable laws and regulations and, where required, based on your prior consent.

We may also share your Personal Data with third-party service providers who assist us in delivering our Services, such as IT support, analytics providers, and communication service providers. These service providers act as data processors and are contractually bound to process your Personal Data only on Our instructions and in accordance with applicable data protection laws.

Where you choose to obtain insurance through insurers providers, We may share your Personal Data with such provider. Insurers providers may process your Personal Data as independent data controllers and will be responsible for their own processing activities. They may share your Personal Data with their affiliates, service providers, payment processors, and other entities involved in the provision and administration of insurance services, in accordance with their own privacy policies. We encourage you to review those policies for further information.

Our business partners, including managing general agents (MGAs), brokers, insurance intermediaries, and claims handlers, may process your Personal Data either as processors acting on our behalf or as independent controllers, depending on the nature of their role.

We may also disclose your Personal Data to regulatory authorities, law enforcement agencies, or other competent authorities where required by applicable law, regulation, or legal process.

## **10. TRANSFERING YOUR PERSONAL DATA**

We may transfer your Personal Data to other countries, including within our group of companies, insurers and third-party service providers and business partners. This is done only where necessary to provide Our services as described in this Privacy Notice. Where required by applicable law, we will ensure that appropriate safeguards are in place before transferring your Personal Data outside the United Arab Emirates. These safeguards are designed to ensure an adequate level of protection for your Personal Data.

- Such safeguards may include, where appropriate:
- transfers to jurisdictions recognised as providing an adequate level of protection;
- the use of contractual safeguards with the recipient of the Personal Data;
- technical and organisational security measures to protect your Personal Data during transfer and processing; or
- other legally permitted transfer mechanisms under applicable Data Protection Law.

If you would like more information about international transfers of your Personal Data and the safeguards We apply, you may contact Us using the details provided in the [Contact Us](#) section below.

## 11. YOUR RIGHTS

You have certain rights in respect of your Personal Data under applicable Data Protection Law:

**Right of access.** You have the right to request access to your Personal Data and obtain information about how we process it.

**Right to rectification.** You may request that we correct or update inaccurate or incomplete Personal Data. In some cases, we may be unable to make changes where the data is required to be retained in its original form for legal or regulatory reasons.

**Right to erasure.** You may request deletion of your Personal Data where permitted by law, for example where the data is no longer required or where you withdraw consent. In certain cases, We may need to retain your Personal Data to comply with legal or regulatory obligations.

**Right to restrict processing.** You may request that we restrict the processing of your Personal Data in certain circumstances, such as where you contest its accuracy or object to its use.

**Right to data portability.** Where the conditions under applicable Data Protection Law are met, you may request that We provide your Personal Data to you or transfer it to another organisation.

**Right to object.** You may object to the processing of your Personal Data in certain circumstances, including where We rely on legitimate interests or for the purposes of direct marketing. You may also opt out of receiving marketing communications at any time.

**Right to withdraw consent.** Where processing is based on consent, you may withdraw your consent at any time. This will not affect the lawfulness of processing carried out before withdrawal.

**Right to complain.** If you have concerns about how we process your Personal Data, you may contact us first so we can address your concerns. You also have the right to lodge a complaint with the competent data protection authority or relevant regulatory authority in the United Arab Emirates if you believe your rights have been infringed.

**Consequences of exercising your rights.** In some cases, exercising certain rights may affect our ability to provide certain Services to you, including where the processing of your Personal Data is necessary for policy administration or legal and regulatory compliance.

## 12. DATA SECURITY

The security of your Personal Data is important to us. We implement appropriate technical and organisational security measures designed to protect your Personal Data against unauthorised access, disclosure, alteration, or destruction.

While we take reasonable steps to protect your Personal Data, no method of transmission over the internet or method of electronic storage is completely secure.

You should also take care to protect any Personal Data you share with Us, including by using secure communication channels. We also recommend that you avoid sharing sensitive personal information unless necessary.

In the event of a personal data breach that is likely to result in a risk to your rights or privacy, we will take appropriate measures, which may include notifying you and/or the relevant regulatory authorities, in accordance with applicable Data Protection Law.

### **13. COOKIES**

Our website may use cookies and similar technologies to support its functionality. You can configure your browser to refuse some or all cookies, or to alert you when cookies are being set or accessed. If you disable or refuse cookies, please note that some parts of our website may not function properly or may become inaccessible.

### **14. CHILDREN'S PRIVACY**

We do not knowingly collect or otherwise process Personal Data relating to children, except with the prior consent of a parent or legal guardian, in accordance with applicable laws and regulations.

Where Personal Data relating to a child is processed in connection with the arrangement or administration of an insurance policy (including where the child is a dependent or beneficiary), such processing shall be limited to what is strictly necessary for that purpose and carried out on the basis of such consent.

If we become aware that Personal Data relating to a child has been processed without valid consent, we will take reasonable steps to cease such processing and address the data in accordance with applicable laws and regulations.

### **15. CHANGES TO THIS PRIVACY NOTICE**

We may update this Privacy Notice from time to time to reflect changes in applicable laws, regulatory requirements, or Our practices. The most current version will always be available on Our Website, and the date of the latest revision will be indicated.

### **16. CONTACT US**

If you have any questions, concerns, or requests related to your privacy, please contact Us at:

Email: [info@almanarahinsurance.ae](mailto:info@almanarahinsurance.ae)

Phone number: [+971 4 5820433](tel:+97145820433)

Address: ETA Al Manara Tower 29th Floor, Office 2904, Business Bay, Dubai, UAE, P.O. box 19644, Sharjah

By continuing to use Our Services or communicating with Us, you acknowledge that you have read and understood this Privacy Notice.