

Privacy Policy

Introduction

On behalf of TABSEER Company (Tabseer, we, us and our), and is addressed to individuals outside our company with whom we interact, including but not limited to customers, visitors to our sites, visitors to our offices and other users of our services (you).

Collection of Personal Data:

We may collect personal data about you from the following sources:

- Data you provide:** we may obtain your Personal Data when you provide it to us (e.g., where you contact us via email or telephone, apply for a position with Tabseer or provide your details on our office visitor log).
- Relationship data:** We may collect or obtain your Personal Data in the ordinary course of our relationship with you (e.g., we provide a service to you or to your employer, or you visit our offices).
- Data you make public:** We may collect or obtain your Personal Data that you manifestly choose to make public, including via social media (e.g., we may collect information from your social media or business networking profile(s)).
- Site data:** We may collect or obtain your Personal Data when you visit any of our Sites or use any features or resources available on or through a Site.
- Registration details:** We may collect or obtain your Personal Data when you use, or register to use, any of our Sites or services.
- Third party information:** We may collect or obtain your Personal Data from third parties who provide it to us.

Creation of Personal Data:

We may also create Personal Data about you, such as records of your interactions with us, or our clients.

Categories of Personal Data we may Process:

We may Process the following categories of Personal Data about you:

- Personal details:** given name(s); preferred name; and photograph (if provided).
- Demographic information:** date of birth; salutation; title; and language preferences.
- Contact details:** address; phone number; email address; and details of your public business networking profile(s) or online biographies.

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- d) **Consent records:** records of any consents you may have given, together with the date and time, means of consent and any related information (e.g., the subject matter of the consent).
- e) **Payment details:** invoice records; payment records; billing address; payment method; bank account number; card or account security details; BACS details; SWIFT details; IBAN details; payment amount; and payment date.
- f) **Data relating to our Sites:** device type; operating system; browser type; browser settings; IP address; language settings; dates and times of connecting to a website; username; password; security login details; usage data; aggregate statistical information; internet service provider (ISP) details; referring and exit pages; and clickstream data.
- g) **Employer details:** when you interact with us in your capacity as an employee, the name, address, phone number and email address of your employer, to the extent relevant.
- h) **Views and opinions:** any views and opinions that you choose to send to us, or publicly post about us on social media platforms.

Legal Basis for Processing Personal Data:

When processing your Personal Data in connection with the purposes set out in this Policy, we rely on one or more of the following legal bases, depending on the circumstances:

- a) **Consent:** We may Process your Personal Data where we have obtained your prior, express consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).
- b) **Contractual necessity:** We may Process your Personal Data where the Processing is necessary in connection with any contract that you may enter into with us.
- c) **Compliance with applicable law:** We may Process your Personal Data when the Processing is required by applicable law or fulfilling our health and safety obligations to employees).
- d) **Vital interests:** We may Process your Personal Data when the Processing is necessary to protect the vital interests of any individual.
- e) **Legitimate interests:** We may Process your Personal Data when we have a legitimate interest in the Processing. The balancing test we have conducted in each case is as follows:
 - 1. We have ensured that the Processing is lawful, proportionate, and conducted in accordance with the terms of this Policy.
 - 2. We have ensured that we have a legitimate business need to perform the Processing.
 - 3. We have ensured that there is no material likelihood of any adverse impact on your interests, fundamental rights, or freedoms, as a result of the Processing.

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Purposes for Which we May Process your Personal Data:

We may Process your Personal Data for the following purposes, subject to applicable law:

- a) **Provision of services:** providing our Sites or services; providing services on request; and communicating with you in relation to those services.
- b) **Our Sites:** operating and managing our websites; providing content to you; displaying advertising and other information to you; communicating and interacting with you via our websites; and notifying you of changes to any of our websites, or our services.
- c) **Communications:** communicating with you via any means (including email, phone, text message, social media, or in person) to provide you with information in which you may be interested (e.g., upcoming Tabseer events, new service offerings, information relevant to you as a Tabseer client), subject to ensuring that such communications are provided to you in compliance with applicable law; maintaining and updating your contact information when appropriate; and obtaining your prior, opt-in consent when required.
- d) **Communications and IT operations:** management of our communications systems; operation of IT security systems; and IT security audits.
- e) **Financial management:** sales; finance; corporate audit; and vendor management.
- f) **Surveys:** engaging with you for the purposes of obtaining your views on our services.
- g) **Security:** physical security of our premises (including records of visits to our premises; and CCTV recordings); and electronic security (including login records and access details).
- h) **Investigations:** detecting, investigating and preventing breaches of policy, fraud, and violations of law, in accordance with applicable law.
- i) **Legal proceedings:** establishing, exercising and defending legal rights.
- j) **Legal compliance:** compliance with our legal and regulatory obligations under applicable law or fulfilling our health and safety obligations to employees).
- k) **Improving our websites, services:** identifying issues with our websites, or our services; planning improvements to our websites, or our services; and creating new websites, or services.
- l) **Recruitment and job applications:** recruitment activities; advertising of vacancies; interview activities; analysis of suitability for the relevant position; records of hiring decisions; offer details; and acceptance details.

Disclosure of Personal Data to Third Parties:

We may disclose your Personal Data to other entities within the Tabseer group, for legitimate business purposes (including operating our websites, and providing services to you), in accordance with applicable law. In addition, we may disclose your Personal Data to:

- a) You and, where appropriate, your appointed representatives;

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- b) Legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- c) Accountants, auditors, lawyers and other outside professional advisors to tabseer, subject to binding contractual obligations of confidentiality;
- d) Third party processors (such as payment services providers; survey partners, marketing outreach providers, cloud service providers, etc.), located anywhere in the world, subject to the requirements noted below in this section;
- e) Any relevant party when we believe disclosure is necessary and appropriate to prevent physical, financial, or other harm, injury, or loss; or
- f) Any relevant third-party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation);

International Transfer of Personal Data:

Because of the international nature of our business, we may need to transfer your Personal Data within the Tabseer group, and to third parties as noted above, in connection with the purposes set out in this Policy. For this reason, we may transfer your Personal Data to other countries that may have different laws and data protection compliance requirements to those apply in the country in which you are located.

If you are located outside of Kingdom Saudi Arabia, you should be aware that the Personal Data you provide to us is being transmitted to us and Processed in the Saudi Arabia, and will be protected subject to this privacy policy and KSA laws, which may not be as protective as the laws in your country.

Data Security:

We have implemented appropriate technical and organizational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access, and other unlawful or unauthorized forms of Processing, in accordance with applicable law.

Because the internet is an open system, the transmission of information via the internet is not completely secure. Although we will implement all reasonable measures to protect your Personal Data, we cannot guarantee the security of your data transmitted to us using the internet – any such transmission is at your own risk and you are responsible for ensuring that any Personal Data that you send to us are sent securely.

Data Accuracy:

We take every reasonable step to ensure that:

- a) your Personal Data that we Process are accurate and, where necessary, kept up to date;

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- b) If any of your Personal Data, that we Process, is inaccurate (having regard to the purposes for which they are Processed) will be erased or rectified without delay.

From time to time, we may ask you to confirm the accuracy of your Personal Data.

Data Minimization:

We take every reasonable step to ensure that your Personal Data that we Process are limited to the Personal Data reasonably necessary in connection with the purposes set out in this Policy.

Data Retention:

We take every reasonable step to ensure that your Personal Data are only Processed for the minimum period necessary for the purposes set out in this Policy. The criteria for determining the duration for which we will retain your Personal Data are as follows:

- a) We will retain copies of your Personal Data in a form that permits identification only for as long as:
1. We maintain an ongoing relationship with you (e.g., where you are a user of our services, or have applied to become one, or you are lawfully included in our mailing list and have not unsubscribed);
 2. Your Personal Data are necessary in connection with the lawful purposes set out in this Policy, for which we have a valid legal basis (e.g., where we have a legitimate interest in processing your data for the purposes of operating our business and fulfilling our obligations under a contract),
- b) The duration of:
1. Any applicable limitation period under applicable law (i.e., any period during which any person could bring a legal claim against us in connection with your Personal Data, or to which your Personal Data may be relevant);
 2. An additional two (2) months period following the end of such applicable limitation period (so that, if a person brings a claim at the end of the limitation period, we are still affording a reasonable amount of time to identify any Personal Data that are relevant to that claim),
- c) In addition, if any relevant legal claims are brought, we may continue to Process your Personal Data for such additional periods since they are necessary in connection with that claim.

During the periods noted in paragraphs (b)(1) and (b)(2) above, we will restrict our Processing of your Personal Data to storage of, and maintaining the security of, those data, except to the extent that those data need to be reviewed in connection with any legal claim, or any obligation under applicable law.

Once the periods in paragraphs (a), (b) and (c) above, each to the extent applicable, have concluded, we will either:

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- a) Permanently delete or destroy the relevant Personal Data; or
- b) Anonymize the relevant Personal Data.

Your Legal Rights:

Subject to applicable law, you may have a number of rights regarding the Processing of your Relevant Personal Data, including:

- a) The right to not provide your Personal Data to us (please, note that we may be unable to provide you with the full benefit of our websites, or our services, if you do not provide us with your Personal Data;
- b) The right to request access to, or copies of, your Relevant Personal Data, together with information regarding the nature, Processing and disclosure of those Relevant Personal Data;
- c) The right to request rectification of any inaccuracies in your Relevant Personal Data;
- d) The right to request, on legitimate grounds:
 1. Erasure of your Relevant Personal Data; or
 2. Restriction of Processing of your Relevant Personal Data;
- e) The right to object, on legitimate grounds, to the Processing of your Relevant Personal Data by us or on our behalf;
- f) The right to have certain Relevant Personal Data transferred to another Controller, in a structured, commonly used and machine-readable format, to the extent applicable;
- g) When we Process your Relevant Personal Data based on your consent, you have the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any Processing performed prior to the date on which we receive notice of such withdrawal, and does not prevent the Processing of your Personal Data in reliance upon any other available legal bases); and
- h) The right to lodge complaints regarding the Processing of your Relevant Personal Data with a Data Protection Authority (in particular, the Data Protection Authority in which you live, or in which you work, or in which the alleged infringement occurred, each if applicable).

This does not affect your statutory rights.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Policy, or about our Processing of your Personal Data, please use the contact details provided below. Please note that:

- a) We may require proof of your identity before we can give effect to these rights; and
- b) Where your request requires the establishment of additional facts (e.g., a determination of whether any Processing is non-compliant with applicable law) we will investigate your request reasonably promptly, before deciding what action to take.

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Cookies and Similar Technologies:

When you visit our website we may place Cookies onto your device, or read Cookies already on your device, always subject to obtaining your consent, when required, in accordance with applicable law. We use Cookies to record information about your device, your browser and, in some cases, your preferences and browsing habits. We may Process your Personal Data through Cookies and similar technologies, in accordance with our Policy.

Terms of Use:

All use of our websites, or our services is subject to our Terms of Use. We recommend that you review our Terms of Use regularly, in order to review any changes, we might make from time to time.

Direct Marketing:

We may Process your Personal Data to contact you via email, phone, direct mail or other communication means to provide you with information regarding services that may be of interest to you. If we provide services to you, we may send information to you regarding our services, upcoming promotions and other information that may be of interest to you, using the contact details that you have provided to us and always in compliance with applicable law.

You may unsubscribe from our promotional email list at any time by simply clicking on the unsubscribe link included in every promotional email we send. After you unsubscribe, we will not send you further promotional emails, but we may continue to contact you to the extent necessary for the purposes of any services you have requested.

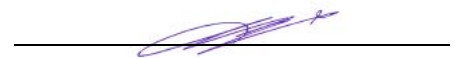
Contact Details:

If you have any comments, questions or concerns about any of the information in this Policy, or any other issues relating to the Processing of Personal Data carried out by us, or on our behalf, please contact:

Quality Department
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CEO

Emad Essa



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