

# Privacy Policy

## Purpose

Mega Fortris Middle East (“we”, “us”, “our”) is committed to safeguarding your privacy and protecting your personal data. We are also committed to compliance with applicable laws, including the UAE Federal Decree-Law No. 45 of 2021 Regarding the Protection of Personal Data (“**UAE PDPL**”).

This Privacy Policy (“**Policy**”) describes how and why we collect, store, use, and/or share (“process”) the personal data you provide to us via our website [www.megafortris.ae](http://www.megafortris.ae), when you purchase and use our products and services (“**Services**”), or when you communicate with us via email, over the phone, or in person.

This Policy explains:

- the type of personal data we collect and process about you;
- how we collect your personal data;
- how we process your personal data;
- why we collect and process your personal data;
- the parties that we disclose your personal data to; and
- the privacy rights available to you and how you may exercise them.

We would like to ensure you are always able to make informed decisions about the personal data you choose to share with us, so we encourage you to read our Policy carefully so that you are aware of how and why we collect, use, and share it.

We will not collect or use your personal data for any purpose other than as described in this Policy. If you have any questions about this Policy, please contact us using the contact details below:

Privacy Officer: Alessio Veroli

Telephone: +971 04 250 8034

Email address: [sales@megafortris.com](mailto:sales@megafortris.com)

## The Personal Data We Collect and Process

The types of information we collect, process, and store will differ, depending on your relationship with us. Most of the information we collect is business information. In certain circumstances, we may also need to collect personal data, where necessary to manage business relationships, provide our Services, recruit employees, and fulfil our legal obligations.

We may collect the following personal data about you:

- personal information used to identify you, including your first and last name;
- contact information such as billing address, address of premises, telephone number, mobile phone number, fax number and email address;
- sales data such as product information with individualised serial numbers, purchase history, transaction records
- financial data such as banking and payment details (where necessary to fulfil transactions);
- designation, function, or post when you begin a business relationship with us; and
- information included in your resume when you apply for a job with us.

When you visit and browse our website, we use cookies to collect certain technical and statistical information such as your IP address, and the time, date, and duration of your visit. For more information concerning our use of cookies, please see our Cookie Policy. You are not obliged to accept cookies.

All personal data that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal data. If you choose not to provide us with your personal data, we may not be able to provide you with some of our Services or consider you for employment opportunities.

## How We Collect Your Personal Data

We may collect personal data either directly from you, from third parties you have authorised, or from publicly available sources, including:

- when you communicate with us in person, by phone, via our website, or by email;
- when you take part in any surveys or questionnaires done internally or via an appointed third party;
- when you begin a business relationship with us;
- when you attend any of our corporate events, marketing campaigns or third-party open days;
- when you visit or browse our websites;
- when you apply for a job with us;
- when you interact with us via social media or interactive applications such as Facebook, Twitter, and Instagram; and
- from such other sources where you have given your consent for the disclosure of personal data relating to you, and/or where otherwise lawfully permitted.

## Why We Collect and Process Your Personal Data

We will only collect and process your personal data for specific, lawful purposes, and where we have a valid reason to do so.

We process your personal data when necessary for the following purposes:

- to verify your identity;
- to act on your instructions or to respond to any enquiries, complaints, comments, or feedback that you have submitted to us;
- to provide you with our Services;
- to manage our business relationships;
- to further develop and improve our Services;
- to enhance our customer service and to provide you with a better experience when dealing with us;
- to conduct surveys, and provide you with information from us or which we feel may interest you, where you have provided your consent for such purposes;
- to market and promote our Services and capabilities to existing and prospective customers;
- to transfer or assign our rights, interests, and obligations under any of your agreements with us;
- to update, consolidate and improve the accuracy of our records;
- to produce data, reports and statistics which have been anonymised or aggregated in a manner that does not identify you as an individual;
- to conduct research for analytical purposes;
- to comply with any legal or regulatory obligations under any laws, regulations, guidelines, or industry codes that apply to us;
- to administer, maintain, and ensure the security of our information systems, websites, staff, and premises; and
- for any other purposes that are required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities.

## Our Legal Bases for Processing Your Personal Data

We rely on the following legal bases to process your personal data:

### Consent

We rely on this basis to process your personal data for a specific purpose. You will have been presented with a consent form or mechanism in relation to any such processing.

Note that if you have previously given consent to our processing your data you can freely withdraw such consent at any time. You can do this by contacting us via email at [sales@megafortris.com](mailto:sales@megafortris.com). If you do withdraw your consent, and if we do not have another legal basis for processing your personal data, then we will stop processing it. If we do have another legal basis for processing your personal data, then we may continue to do so, subject to your rights.

If you provide us with any personal data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), by submitting such personal data to us, you confirm to us that you have (i) obtained the consent of the third party to provide us with their personal data or are otherwise entitled to provide their personal data to us, and (ii) informed them to read this Policy at our website at [www.megafortris.ae](http://www.megafortris.ae) or by requesting a copy via email at [sales@megafortris.com](mailto:sales@megafortris.com).

### **Contract**

We rely on this legal basis when we need to process your personal data for the purposes of entering, or performing under, a contract to which you or your organisation are a party.

This may include processing personal data during procurement, when preparing quotes, when conducting background and reference checks, when processing payments, during debt recovery, enforcement, and other processes related to the performance of our contract with you.

We may also process personal data when necessary for the commencement or defence of legal claims, for the purposes of carrying out our employment and social security obligations, and to enable our compliance with other legal obligations to which we are subject.

### **How, and Why, We Share Your Personal Data**

From time to time, we are required to share the personal data we process with our employees, other Mega Fortris group companies, contractors, and the service providers who assist us in establishing or managing your relationship with us, including third-party service providers that provide products or services to us or on our behalf, and partners that collaborate with us to provide our Services to you. Our third-party service providers include our technology providers (who provide the hosting, functionality, and support services we need to provide you with our website and Services), as well as our professional advisers (including accountants, and legal professionals).

We may disclose any data about you when such disclosure is necessary to prevent fraud or to comply with any statute, law, rule, or regulation of any government authority or any order of any court of competent authority. We may be required to disclose information about you to credit reference agencies or other organisations that help us make credit decisions and reduce the incidence of fraud; and in the event of default, debt collection agencies. We may also share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

When we share personal data with these parties, we take reasonable steps to ensure that they have security measures and technologies in place to protect your personal data. We typically require that they use or disclose personal data only as instructed by us and in a manner consistent with this Policy. We also enter into agreements with these parties to ensure they respect the confidentiality of your personal data and have the appropriate data security measures in place to protect it.

### **International Transfers of Personal Data**

From time to time, we may need to transfer your personal data outside of your country of residence, to other jurisdictions where we conduct business, and where our third-party service providers are located.

We note that these jurisdictions may have less stringent data protection laws than those of the UAE, and any information held by the recipients may become subject to their laws and disclosure requirements, including disclosure to government bodies and regulatory authorities.

We may only transfer your personal data to another jurisdiction when:

- the transfer is to a jurisdiction that is deemed to provide adequate protection of your personal data by the UAE Data Office; or
- where we have otherwise put in place adequate protections (such as binding contracts, or additional technical and organizational safeguards) to ensure your personal data is afforded a level of protection equivalent to that provided under the UAE PDPL.

When we, or our permitted third parties, transfer your personal data to jurisdictions not deemed adequate, we will impose contractual obligations on the recipients of that data to ensure they handle it safely, and lawfully, and apply the appropriate data security measures to protect it.

If we transfer your personal data outside the UAE in other circumstances (for example, if required by law), we will take all necessary steps to ensure it remains adequately protected.

## Your Privacy Rights

You may exercise the following privacy rights provided under the UAE PDPL:

**Right of Access to Information** – In addition to the information set out in this Policy, you can ask us to confirm whether we are processing personal data about you, and if so, to provide more specific information about how we process it.

**Right to Correct or Delete Personal Data** – You can ask us to correct the data we hold about you if you believe it is inaccurate or incomplete. Please note that we may need to verify the accuracy of any new data you provide to us. In certain circumstances, you can ask us to delete your personal data (for example, after you withdraw your consent to processing, or when we no longer need it for the purpose for which we collected it). Please note that we can refuse to comply with a deletion request if we need to retain the data in order to comply with a legal requirement, to defend legal claims or for any other lawful purpose under the UAE PDPL.

**Right to Restrict Processing** – You can ask us to temporarily restrict our processing of your personal data if you contest the accuracy of your personal data, prefer to restrict its use rather than having us erase it, or need us to preserve it for you to establish, exercise, or defend a legal claim. A temporary restriction may apply while verifying whether we have overriding legitimate grounds to process it. You can ask us to inform you before we lift that temporary processing restriction.

**Right to Data Portability** – In certain circumstances, where you have provided personal data to us, you can ask us to transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another company, if it is technically feasible.

**Automated Decision-Making** – You can ask us to review any decisions made about you that we made solely based on automated processing, including profiling, which produced legal effects concerning you or similarly significantly affected you and you have the right not to be subject to such decisions. We will include a human intervention element in the review of automated processing decisions at your request.

**Right to Object to Direct Marketing including Profiling** – You can object to our use of your personal data for direct marketing purposes, including profiling. We may need to retain some information to comply with your request to cease marketing to you, but this will be limited to the minimum amount necessary. Unless we expressly obtain your consent, we will not use any personal data collected via our website for direct marketing purposes.

**Right to Withdraw Consent** – You can withdraw your consent at any time that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain Services to you, and we will advise you if this is the case.

**Right to Complain**– You have the right to complain at any time to the relevant data protection supervisory authority in your jurisdiction. We would welcome the chance to deal with any concerns or complaints concerning our processing of your personal data in the first instance.

You may exercise your rights at any time, by contacting us via email at [sales@megafortris.com](mailto:sales@megafortris.com). Please provide us with your name, address and phone or account number, and provide brief details of the nature and scope of your request.

We may need to request additional information from you to help us verify your identity, and to ensure your right to access the information or to exercise any other rights. This helps us to ensure that personal data is not disclosed to any person who has no right to receive it. We will respond to your request within the timeframe required by the UAE PDPL, and we will not charge you a fee to process your request unless your request is clearly unfounded or excessive.

In certain circumstances, we may be unable to comply with your request, for example:

- where we are unable to confirm your identity;
- where information requested is of a confidential commercial nature;
- where granting you access would harm the privacy of other individuals; or
- in the event we receive repeated requests for the same information.

We will always notify you in writing of our reasons for not being able to comply with your request.

## **How Long We Will Keep Your Personal Data**

We will keep your personal data in compliance with this Policy and/or the terms and conditions of your agreement(s) with us, for such period as may be necessary to protect our interests and/or our customers as may be deemed necessary, where otherwise required by the law and/or where required by our relevant policies. We will take all reasonable steps to securely destroy or delete your personal data once it is no longer required for the purpose(s) set out in this Policy.

## **How We Protect and Safeguard Your Personal Data**

We use a range of measures to ensure we keep your personal data secure, accurate and up to date. These measures include:

- education and training to relevant staff to ensure they are aware of our privacy obligations when handling personal data;
- administrative and technical security controls, such as policies to restrict access to personal data to a 'need to know' basis; strong password controls, and procedures to ensure proper customer identity verification;
- we may also apply pseudonymisation, de-identification and anonymisation techniques in efforts to further protect personal data.

The transmission of data over the internet (including by e-mail) is never completely secure. Despite our best efforts to protect your personal data, we cannot guarantee the security of data transmitted via the Internet, so please ensure you access our website and Services from a secure environment.

## Revisions to this Policy

From time to time, we may update this Policy. When we update this Policy, we will publish the amended version on our website, and the updated version shall apply and supersede any and all previous versions. We encourage you to review this Policy regularly, by accessing the latest on our website, [www.megafortris.ae](http://www.megafortris.ae). You can also request an up-to-date version of this Policy by making a request using the contact details below.

This Policy was last updated on 18th December 2023.

## Contact Us

Should you have any queries, concerns, or complaints concerning our handling of your personal data, or if you wish to exercise your privacy rights, kindly contact us at the following details:

### **Mega Fortris Middle East**

Address: Office 908, IT Plaza, Dubai Silicon Oasis  
Telephone: +971 04 250 8034  
Email: [sales@megafortris.com](mailto:sales@megafortris.com)  
Attention: Alessio Veroli