

# Data Privacy Notice

## Data Privacy Notice

Seera Investment Company B.S.C. (c) (hereafter referred to as "we" or "our" or "us" or "Seera" or "organisation" or "organization") respects your right to data privacy. In this Notice "You" or "Your" refers to data subject (investors, shareholders, employees, website visitors or contingent workers) whose personal data is processed by Seera.

This privacy notice explains who we are, how we collect, share and use personal data about you, and how you can exercise your data privacy rights. The details on what personal data will be processed and which method will be used depend significantly on the services applied for or agreed upon.

### Definitions

- a) **Consent:** Consent of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal/ sensitive personal data relating to him or her.
- b) **Data Controller/ Data Protection Officer (DC/ DPO)** - A person who, either alone or jointly with other persons, determine the purposes and means of processing any particular personal data; except that where the purposes and means of the processing of personal data are determined by law, the person entrusted with the processing obligation is deemed for the purposes of this Law to be the Data Controller.
- c) **Data Subject:** The natural person, legal person or individual subject of data.
- d) **Data Protection Guardian:** The independent/ external person/ entity licensed by the Authority who shall be responsible to implement the provision of the Law.
- e) **Personal Data:** Any information relating to a data subject who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an 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 data subject. This may also include photographs and/or video footage taken during events or for a specific purpose.
- f) **Sensitive Personal Data:** Data that reveals your racial or ethnic origin, religious, political or philosophical beliefs or trade union membership; genetic data; biometric data for the purposes of unique identification; or data concerning your health.
- g) **Processing:** Processing is any operation or set of operations which is performed on personal/ sensitive personal data or on sets of personal/ sensitive personal data, whether or not by automated means, such as collection, recording, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- h) **Data Processor:** a person, other than an employee of the DC/ DPO or data processor, who processes personal/ sensitive personal data for the DC/ DPO's benefit and on the DC/ DPO's behalf.
- i) **Third Party:** Any person other than:
  - Data subject;
  - DC/ DPO;

- Data processor;
  - Data protection guardian; and
  - Any person, under the direct authority of the DC/ DPO or data processor, authorized to process data for the benefit of DC/ DPO or data processor
- j) **Contingent Workers:** Contingent workers means non-permanent workers including agents, consultants, independent contractors, sub-contractors, temporary workers, professional advisors, interns, trainees and those affiliated with third parties.
- k) **Joint Controller:** Where two or more controllers jointly determine the purposes and means of processing, they shall be joint controllers.
- l) **Group Company (Group):** includes a holding company, subsidiary, associate company (including a joint venture company) and a subsidiary of a holding company to which the company is also a subsidiary.
- m) **Direct Marketing:** Communication, by whatever means, of any marketing material or advertisement which is directed to a person.
- n) **Authority:** Personal data Protection Authority (to be) established by the Personal data Protection Law, Bahrain and the supervisory- authority of the EU Global Data Protection Regulation (GDPR).

If you have any questions or concerns about our processing of your personal data, then please contact us at [Privacy@seera.com](mailto:Privacy@seera.com).

## When do we collect your personal data?

### Direct interactions

You may give us your identity, contact, resume or KYC related information by filling in forms or by corresponding with us by phone SMS, and email or otherwise. This includes sharing of personal data for the following purpose:

- a) Records of your interactions with us such as emails and other correspondence and your instructions to us;
- b) Providing your feedback;
- c) By filling in forms
- d) By sharing your personal data such as resume for recruitment purpose;
- e) By interacting with us on social media platforms
- f) Request marketing material to be sent to you;
- g) By sending us emails and text messages (SMS or WhatsApp or Chat Service);

### Automated technologies or interactions

**Log Files.** Log information is data about your use of the Service, such as IP (Internet Protocol) address, browser type, referring/exit pages, operating system, date/time stamps, and related data, which is stored in log files.

**Cookies.** A cookie is a small data file transferred to your computer (or other device) when it is used to access our service. Cookies may be used for many purposes, including to enable certain features of our service and remember your preferences, your equipment, browsing actions and patterns, to better understand how you interact with our service, to provide you advertising on and off the service, and to monitor usage by visitors and online traffic routing. You may be able to instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the online services you

visit. If you do not accept cookies, however, you may not be able to use all portions of our Service or all functionality of our Service.

Please see our cookie policy for further details.

### **Third parties or publicly available sources**

We may receive personal data about you from various third parties, via public domains such as:

- Personal data gathered from publicly available directories/ registers are processed fairly, lawfully with adequate level of security and are not excessive in relation to the purpose for which they are collected.

### **What personal data do we collect?**

We may collect, store, and use the following categories of personal data about you:

#### **Identity Data**

- a) First name
- b) Last name
- c) Username
- d) System generated unique ID
- e) Date of Birth
- f) Gender
- g) CPR details
- h) Driving license
- i) Photographs

#### **Financial Data**

- a) Bank account number
- b) Name as per bank account
- c) Copy of cancelled cheque

#### **Contact Data**

- a) Email address
- b) Telephone numbers/ contact number
- c) Residential address
- d) Billing address
- e) Delivery address

#### **Communications data**

We may collect your personal data for responding to your queries.

#### **Sensitive Personal Data or Special Category of Personal Data**

We do not collect, store and use the following “special categories” of sensitive personal data regarding you such as:

- a) Information about your race or ethnicity, religious beliefs and sexual orientation.
- b) Information about your health, including any medical condition, health and sickness records, medical records and health professional information.

- c) Any criminal records information in relation to you, and
- d) Biometric information about you as an employee, for example fingerprints, retina scans.

Our intent is not to collect or process any sensitive personal data about you, unless required by applicable laws. However, in certain circumstances, we may need to collect, or request your special category of personal data for employment related purposes via Resume shared, for example, data regarding your hobbies and preferences, gender and disabilities for the purposes of equal opportunities monitoring, to comply with anti-discrimination laws and for government reporting obligations.

### **How and why do we use your personal data?**

We will only use your personal data when the law allows us to. We will use your personal data in the following circumstances:

The processing is necessary for reasons of substantial public interest, or for official purposes or requested for or by the police or governmental authorities on a lawful basis;

- It is necessary for the establishment, exercise or defense of legal claims, for the purposes of carrying out the obligations and exercising our or your rights in the field of employment, social security and social protection law; or

Based on your explicit consent;

- Where we need to perform the contract we have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where processing is necessary in order to protect the vital interests of the data subject or of another natural person.

### **Legitimate Interest**

- a) We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests;
- b) We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by laws); and
- c) We may also use your personal data in the following situations, which are likely to be rare:
  - i. Where we need to protect your interests (or someone else's interests);
  - ii. Where it is needed in the public interest or for official purposes.

### **Purpose/ activity, type of data and lawful basis for processing**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal base(s) we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

However, we normally collect personal data from you only where we have your consent to do so, where we need the personal data to perform a contract with you, or where the processing is in the legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In certain cases, we may also have legal obligations to collect personal data from you or may otherwise need the personal data to protect your vital interests or those of another data subject.

If we ask you to provide any other personal data, then the personal data we will ask you to provide, and the reasons why we ask you to provide the personal data, will be made clear to you at the point we collect your personal data.

### **Request to withdraw consent**

At any point, if you wish to withdraw your consent to receive marketing/ promotional information from Seera, you can write an email to our concerned department at [placement@seera.com](mailto:placement@seera.com).

Kindly note that this does not apply to personal data provided to us.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the contact details provided.

### **Who do we share your personal data with?**

On occasion we may have to share your personal data with the parties set out below for the purposes set out.

### **Group Entities/ Subsidiaries**

We shall share your personal information with our parent/ group company/ entities for reporting purposes, having similar arrangements.

### **External Third Parties**

- a) Regulators and other authorities: acting as processors or joint controllers based in Bahrain who require reporting of processing activities in certain circumstances.
- b) Any new business partners: we may have over time, for example, in the event of a joint venture, reorganization, business merger or sale that affects us.
- c) The police, local authorities, the courts and any other government authority: if they ask us to do so (but only if our doing so is lawful).
- d) Other people who make a 'data subject access request': where we are required to do so by law.

- e) We may also share the information we collect where we are legally obliged to do so, e.g. to comply with a court order.
- f) Third parties/ Data Processors: to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers/ data processors to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions/ third party agreements.

### **International Transfers**

Some of our external third parties are based outside the Kingdom of Bahrain so their processing of your personal data will involve a transfer of data outside the Kingdom. Whenever we transfer your personal data out of the Kingdom, including cloud hosting, backup systems or data recovery sites, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- subject to prior approval from the Authority; or
- with your consent; or
- to countries that have been deemed to provide an adequate level of protection for personal data and are whitelisted by the Authority.

Please contact us if you want further information on how we transfer your personal data out of the Kingdom.

### **How we protect your personal data?**

We use appropriate technical and organizational measures to protect the personal data that we collect and process. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal data.

A lot of the information we receive reaches us electronically, originating from your devices, and is then transmitted by your relevant telecoms network provider. Where it's within our control, we put measures in place to ensure this 'in flight' data is as secure as it possibly can be.

We use secure means to communicate with you where appropriate, such as email with secured encryption protocols.

### **How long will we keep your personal data?**

To make sure we meet our legal data protection and privacy obligations, we only hold on to your information for as long as we actually need it for the purposes, we acquired it for in the first place. After that we will either delete it, mask it or anonymize it so that it cannot be linked back to you.

We retain personal data we process where we have legitimate interest, performance of the contract, vital interest of data subject or of another natural person, performance of a task carried out in the public interest or in the exercise of official authority vested or for the purposes of satisfying any legal, accounting, or other regulatory reporting requirements or with your consent.

By law we have to keep basic information about our investors and shareholders (including contact and identity data) for 10 years after they cease being investors and shareholders for legal purposes.

## **What are your data protection rights?**

### **Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes by sharing your updated details with our DC/ DPO at [Privacy@seera.com](mailto:Privacy@seera.com).

### **Your rights in connection with personal data**

Under certain circumstances, by law you have the right to:

- a) Request access: To your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- b) Request rectification: Of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. We may need to verify the accuracy of any new data you provide to us.
- c) Request erasure: Of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- d) Object to processing: Of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which means we can continue to process your personal data.
- e) Request the restriction of processing: Of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - i. if you want us to establish the data's accuracy;
  - ii. where our use of the data is unlawful but you do not want us to erase it;
  - iii. where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - iv. You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- f) Request for portability: Of your personal data to another party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- g) Right to withdraw consent at any time: Where we are relying on consent to process your personal data. However, 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 products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- h) Right to lodge a complaint with the Authority: In case you consider that the processing of your personal data infringes any of your rights or provisions related to the laws and regulations in scope.

### **Fees for excessive or unreasonable requests**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is unfounded or excessive.

### **Time limit to respond**

We try to respond to all legitimate requests within 15 business days. Occasionally, it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

We may also contact you to ask you for further information in relation to your request to speed up our response.

If you wish to exercise any of the rights set out above, please contact us at [Privacy@seera.com](mailto:Privacy@seera.com).

### **Indemnity and Limitation of Liability**

You agree to defend, indemnify and hold harmless Seera, its officers, directors and employees from and against any and all claims, liabilities, damages, losses or expenses, including settlement amounts and reasonable legal fees and costs, arising out of or in any way connected with your access to or use of this site.

Although Seera shall make every attempt to keep the Website free from viruses, it cannot guarantee that it is virus/ malware free. For your own protection, you should take necessary steps to implement appropriate security measures and utilize a virus scanner before downloading any information from the website.

Seera, its directors and employees, shall not be liable in any manner whatsoever for any direct, indirect, incidental, consequential, or punitive damage resulting from the use of, access of, or inability to use the information available on the Website or the services provided by us. Seera, its directors and employees shall not be liable in any way for possible errors or omissions in the contents in the Website.

### **Intellectual Property Rights**

All information on this website is protected by copyright and other intellectual property rights. No images, text or other content from this website may be distributed or reproduced without the prior written approval from Seera.

### **Changes to this data privacy notice**

We may update this data privacy notice from time to time in response to emerging legal, technical, contractual, regulatory or business developments. When we update our data privacy notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any privacy notice changes if and when this is required by applicable laws.

If you have any questions about this privacy notice, please contact the DC/ DPO at [Privacy@seera.com](mailto:Privacy@seera.com).