

PRIVACY POLICY

AXELLECT HOLDING COMPANY LTD

1. Policy statement

1.1. Axellect Holding Company Ltd and/or its affiliates and entities (the "**Axellect**") is committed to protecting the personal data of the employees and third parties. Personal data (the "**Personal Data**") shall be defined as information that can be used to uniquely identify, contact or locate an individual or a company. Axellect may only process personal data for legitimate purposes as permitted or required under applicable UAE, Emirate of Dubai and DIFC Data Protection Law (the "**DP Law**").

1.2. Axellect shall not retain personal data for longer than it is needed, and Axellect can only use it for the purpose it was originally collected for. Personal data received from third parties is protected and used only in ways explicitly agreed. Personal data that is transferred to third parties must be appropriately safeguarded and managed in compliance with the relevant laws and regulations. As and when required, Non-Disclosure Agreements are signed between Axellect and third parties.

2. Compliance and Administration

2.1. Axellect's clients and employees have rights with regard to the way in which their Personal Data is collected, stored and processed. This privacy policy (the "**Policy**") sets out the basis on which any information, including any personal data, Axellect collects from the employees and third parties, or the employees and third parties provide to Axellect, will be processed by Axellect.

2.2. Axellect recognises that the fair and lawful treatment of this Personal Data will maintain confidence in Axellect and will support successful operations. All Axellect employees and contractors must comply with the Policy when processing Personal Data on Axellect's behalf. Any breach of this Policy may result in disciplinary action against the breaching party.

2.3. The Personal Data, which Axellect holds in relation to customers, employees, suppliers and other third parties is subject to certain legal safeguards specified in applicable data protection laws and regulations, including the Federal Decree Law No. 45 of 2021 regarding the Protection of Personal Data and DIFC Law No. 5 of 2020.

2.4. As such, it is the Policy to respect the privacy of Axellect employees, third parties and website services at <https://axellect.com> (the "**Website**"). In accordance with the DP Law Axellect collects information about users of Website (the "**User**") when they use or access Axellect websites, use Axellect email addresses for contact purposes, or avail of other web-based products, information or services (collectively, the "**Website Services**").

3. Data collection and protection principles

3.1. Axellec may in ordinary course of business collect and process information about anyone who:

- is employed by Axellec, including contractors and temporary employees;
- attends Axellec business development, marketing or other company sponsored events;
- contacts Axellec for information about its products and services;
- interacts and communicates with Axellec in a business capacity;
- provides or handles information relating to suppliers and other third parties;
- provides User data in the feedback form with the Axellec posted on the Website.

3.2. Such information may include, but is not limited to:

3.2.1. Name, gender, home address, and telephone number, date of birth, marital status, emergency contacts;

3.2.2. Residency and visa status, nationality and passport information;

3.2.3. Emirates ID number, banking details;

3.2.4. Information required to comply with laws, the requests and directions of law enforcement authorities or court orders (i.e., debt payment information);

3.2.5. Information captured on security systems, including CCTV and key card entry systems;

3.2.6. Voicemails, emails, correspondence and other work product and communications created, stored and transmitted by an employee using Axellec's computer or communications equipment;

3.2.7. Technical information, including the type of mobile device used, a unique device identifier (for example, mobile network information, your mobile operating system, the type of mobile browser used, device token, device type, time zone setting);

3.2.8. Data additionally provided by the User on the Website.

3.2.9. Employee information, including:

- Sick pay, pensions, insurance and other benefits information (including the gender, age, nationality and passport information for spouse, minor children or other eligible dependents and beneficiaries);
- Dates of hire, date(s) of promotion(s), work history, technical skills, educational background, professional certifications and registrations, language capabilities, training courses attended;

- Records of work absences, vacation entitlement and requests, salary history and expectations, performance appraisals, letters of appreciation and commendation, and disciplinary and grievance procedures (including monitoring compliance with and enforcing Axellec policies);
- Where permitted by law and proportionate in view of the function to be carried out by an employee or perspective employee, the results of credit and criminal background checks, health certifications;
- Date of resignation or termination, reason for resignation or termination of employment ((i.e., references).

3.3. Anyone processing such information must adhere to the following principles of lawfulness, transparency and accountability:

3.3.1. Personal data must be collected for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes.

3.3.2. Personal data must be adequate, relevant and limited to those which are necessary in relation to the purposes for which they are processed.

3.3.3. Personal data must be accurate and, where necessary, kept up to date.

3.3.4. Personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

3.4. Axellec will take all steps reasonably necessary to ensure Personal Data is processed fairly and lawfully, in accordance with the DP Law, other applicable laws and this Policy. By submitting Personal Data, Axellec expects employees, third parties and Users to understand that such transfer, storing or processing in order for Axellec to perform its general administrative and regulatory functions is necessary and will be done in a proportionate, lawful manner, including, but not limited to, responding to enquiries you raise via Website Services and maintaining contacts for future informational or promotional activities. Unless otherwise notified, Axellec does not ordinarily rely solely on automated decision making when processing Personal Data.

3.5. Axellec is not responsible for the accuracy of the information employee, third parties or Users provide and will modify or update Personal Data in Axellec databases when employee, third parties or Users provide updated information or ad hoc upon their request.

4. Data security

4.1. Axellec will take appropriate security measures against unlawful or unauthorised processing of Personal Data, and against the accidental loss of, or damage to Personal Data. Axellec will put

in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction.

4.2. All Axellec employees are responsible for ensuring the security of Axellec systems by adhering to this and related policies, which contain details about appropriate use and security of the devices and systems that are in the Axellec IT environment.

5. Disclosure and sharing of Personal Data

5.1. Axellec may share personal data hold with any member of Axellec but must do so confidentially in all instances.

5.2. Axellec may also disclose personal data to third parties:

- In the event that Axellec sell or buy any business or assets, in which case Axellec may disclose personal data to the prospective seller or buyer of such business or assets.
- If Axellec or substantially all of Axellec assets are acquired by a third party, in which case personal data will be one of the transferred assets.
- If Axellec is under a duty to disclose or share a personal data in order to comply with any legal obligation, or in order to enforce or apply any contract or other agreements; or to protect rights, property, or safety of Axellec employees, customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

5.3. Axellec may share personal data with selected third parties for the purposes including but not limited to fulfilling employee contract requirements such as payroll and medical insurance; enabling vendors to satisfy client requirements; or to support relevant client or employee engagements.

6. User Requests

6.1 Information about the data processed by Axellec, including the User's personal data, is provided to the User or his representative when contacting (requesting). Requests are sent in electronic form to the address indicated on the Website or in another form provided for by the current legislation of the United Arab Emirates. The User has the right to withdraw consent to the processing of his personal data by sending a written application to the Axellec at the Axellec's location in accordance with the requirements of DP Law.

6.2 Users have the right to:

- on the basis of a request to receive information from the Axellec regarding the processing of User information;
- refuse to process Personal Data by sending Axellec a corresponding request in accordance with the procedure provided for in Article 6.1 of this Policy.

7. Changes to this Policy

7.1. This Policy may be amended by Axellect with the notification of Users by posting a new version of the amended policy on the Website. Changes to the Policy made by Axellect come into force on the day following the day of its posting on the Website of the new version of the Policy.

7.2. The User undertakes to independently check this Policy for any changes made. The User's failure to perform familiarization actions cannot serve as a basis for the User's failure to fulfill his obligations and the User's failure to comply with the restrictions established by this Policy.