

ADVAITA Data Protection & Privacy Policy

Last updated: __ August 2025

The purpose of our Data Protection & Privacy Policy is to outline how we deal with any Personal Data you provide to us throughout the course of your interactions, communications, or business dealings with Advaita Group.

Throughout this Policy, the pronouns “we” or “us” or the term “the Company”, means Advaita Group DMCC, UAE and its group of companies including its affiliates, subsidiaries and related companies, wheresoever situate. The pronouns “you” or “your” means the person, organization, or entity including customers, business contacts, suppliers and service providers to the Company which includes, as appropriate, their respective directors, officers, employees, agents, representatives, contractors and personnel.

This policy describes how we collect, process, retain, and disclose Personal Data about you when interacting with you through our website - <https://www.advaita.trade/> (“**Website**”), how your personal information is processed and for what purposes we process your information during the recruitment process.

This policy applies only to information we collect:

- through the Website;
- in communications, including email, text, chat, and other electronic messages, between you and us.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party (including our affiliates and subsidiaries) that does not link to this policy; or
- any third party.

We may provide additional or different privacy policies that are specific to certain features, services, or activities where applicable.

Please read this policy carefully to understand our policies and practices regarding your information and how we treat it. By using our Website, you acknowledge and agree to the practices described in this policy, subject to your rights under applicable law.

This policy does not apply to career applications or recruitment processes. If we collect such data, it will be covered by a separate privacy notice specific to recruitment.

We reserve the right to vary, change or update this Data Protection & Privacy Policy from time to time in the future to keep it up to date with legal requirements.

Children's and Minors' Data

Our website is not intended for, and we do not knowingly collect any Personal Data from children under the age of 18. If we learn we have collected or received Personal Data from a child under 18 years old without verification of parental consent, we will delete that information.

The Personal Data That We Collect or Process

“Personal Data” is information that identifies, relates to, or describes, directly or indirectly, you as an individual, such as your name, email address, telephone number, home address, or any other identifier we may use to contact you online or offline.

The types and categories of Personal Data we collect or process include:

- Account and contact information, including name, address and other contact information you provide us;
- Location information, including general geographic location such as country, city and/or precise geolocation, if you have enabled and consented to location information collection;
- Device information, including your IP address, device identifiers, operating system and version, preferred language, hardware identifiers, browser type and settings, and other device information;
- Identity document information, if you have consented to such information collection;
- Names and contact details for references. Please note that it is your responsibility to obtain consent from your references prior to providing us with personal information about them.

We rarely collect sensitive Personal Data by design. However, in certain circumstances, we will hold sensitive Personal Data about you by default where this information forms part of your personal contact details.

Your Personal Data may be processed for the following purposes:

- a) for day to day operational and business purposes;
- b) to communicate with you regarding your contract, enquiries, or other matters arising from your relationship with us, including responses to your communications and information we consider relevant or of potential interest;
- c) to investigate and report on your feedback, complaints and grievances and known or suspected misconduct, suspicious activity, fraudulent, or criminal activity, and includes any other activity that we assess may cause you, us, or others harm, as required by applicable laws.

To comply with our legal and regulatory obligations in relation to anti-money laundering and sanctions restrictions, we will screen your name against global sanctions lists, including those maintained by the United Nations, European Union, United States Office of Foreign Assets Control (OFAC), and the UAE Central Bank. Screening will involve searching our internal and third-party databases to ensure you are not listed as a sanctioned individual or entity.

Lawful Bases for Processing

We process Personal Data only where permitted by law. The lawful bases on which we rely include:

- Contractual necessity - where processing is required to perform a contract with you or to take steps prior to entering a contract.
- Legal and regulatory obligations - where processing is required to comply with applicable laws, including anti-money laundering, sanctions, tax, and corporate record-keeping obligations.
- Legitimate interests - where processing is required for our legitimate business interests, provided these interests are not overridden by your fundamental rights and freedoms.
- Consent - where you have provided your clear consent for us to process your data for specific purposes, such as for marketing communications.

The Requirement to process Personal Data

The provision of your Personal Data for the purposes described above is a contractual requirement. In addition, we may need to process your Personal Data to comply with statutory requirements, such as keeping proper records of financial transactions. We cannot continue to facilitate and administer your contract, service agreement or relationship with us, if you fail to provide your Personal Data for the purposes described above.

CCTV, Photography and Video Recording

We operate CCTV at our company premises. Images and recordings collected through our CCTV will be collected for specified, explicit and legitimate purposes (e.g. security purposes, health and safety) and they will not be processed in a manner that is incompatible with those purposes. In accordance with the legitimate business of the Company your image if captured in our CCTV may be used if required for security, health and safety purposes.

However, where our events and/or meetings are held in public venues and in accordance with the legitimate business and promotional interests of our business members of the press and press photographers/videographers are present. In such cases, press photography may be subject to the policies and practices of independent media organizations, which we do not control.

Who We Disclose Your Information To

Your Personal Data will be shared as required with relevant people for legitimate and reasonable purposes as outlined in this policy. We may share Personal Data within our Company and its group of companies wherever located.

We may also disclose your Personal Data:

To comply with any court order, law, or legal process, including responding to any government or regulatory request.

If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of our organization, our customers/members, or others.

International Data Transfers

Where we transfer your Personal Data outside the United Arab Emirates (UAE) or the European Economic Area (EEA), we will ensure that such transfers are made in compliance with applicable data protection laws. This may include:

- transfers to countries that have been deemed to provide an adequate level of data protection.
- implementing contractual protections, such as standard contractual clauses approved by the European Commission or other competent authorities; or
- relying on other lawful transfer mechanisms under applicable law.

You may contact us for further information on the safeguards applied to international transfers of your Personal Data.

Compliance with UAE Data Protection Law

For Personal Data transfers from the UAE, we comply with Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data and any related Cabinet Resolutions governing international data transfers. Where required, we will ensure appropriate safeguards and obtain necessary approvals before transferring Personal Data outside the UAE.

Your Rights and Choices About Your Information

This section describes mechanisms you can use to control certain uses and disclosures of your information and rights you may have under applicable law, depending on where you live.

We have implemented generally accepted standards of technology and operational security to protect personal information from loss, misuse, alteration or destruction. We require all employees and principals to keep personal information confidential and only authorized personnel have access to this information.

Personal Data Retention Periods

Except as otherwise permitted or required by applicable law or regulation, we only retain Personal Data for as long as necessary to fulfill the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of Personal Data, the potential risk of harm from

unauthorized use or disclosure of Personal Data, the purposes for processing the Personal Data, whether the employer can fulfill the purposes of processing by other means, and any applicable legal requirements.

Your Country Privacy Rights

Depending on your country of residency, you may have certain rights related to your Personal Data, including:

Access and Data Portability. You may confirm whether we process your Personal Data and access a copy of the Personal Data we process. To the extent feasible and required by applicable law, data will be provided in a portable format. Depending on your jurisdiction, you may have the right to receive additional information, and it will be included in the response to your access request.

Correction. You may request that we correct inaccuracies in your Personal Data that we maintain, considering the information's nature and processing purpose.

Deletion. You may request that we delete Personal Data that we maintain, subject to certain exception under applicable law.

Important: The exact scope of these rights vary by jurisdiction. There are also several exceptions where we may not have an obligation to fulfill your request.

To exercise any of these rights, please email us at info@advaitatrade.com.

We may not always be able to fully address your request, for example, if it would impact on the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

How long do we retain your Personal Data

We will retain your Personal Data (including sensitive data) for as long as we have a relationship with you, and thereafter only for as long as required by applicable legal, regulatory, or operational obligations, including to:

- a) comply with our records retention obligations and for any extended period reasonably determined necessary; and
- b) investigate or process complaints or defend or bring legal claims.

At the end of the retention period, Personal Data will be securely deleted, destroyed, or anonymized.

How We Protect Your Personal Data

We use commercially reasonable administrative, physical, and technical measures designed to protect your Personal Data from accidental loss or destruction and from unauthorized access, use, alteration, and disclosure. However, no website, mobile application, system, electronic storage, or online service is completely secure, and while we implement commercially reasonable measures to protect your data, no system is completely secure, and therefore we cannot guarantee absolute security. Email, texts, and

chats sent to or from us may not be secure, and you should carefully decide what information you send to us via such communications channels. Any transmission of Personal Data is at your own risk.

The safety and security of your information also depend on you. You are responsible for taking steps to protect your Personal Data against unauthorized use, disclosure, and access. We advise you to provide your computer with software tools to protect the transmission/reception of your data in and out of the network (such as an up-to-date antivirus system) and to ensure that your Internet service provider has taken the necessary steps to ensure the security of networked data transmission (such as firewalls and spam filters).

Changes to Our Privacy Policy

We may update this policy from time to time, and we will provide notice of any such changes to the policy as required by law. The date the privacy policy was last updated is identified at the top of the page. We will notify you of changes to this policy by updating the "last updated" date and posting the updated policy on the website.

Contact Information

If you have any questions or concerns regarding the processing of your Personal Data or wish to exercise any of your rights, please contact:

ADDRESS: Unit No: 3407-A, Platinum Tower, Cluster I, Jumeirah Lakes Towers, Dubai,
United Arab Emirates

EMAIL ADDRESS: info@advaitatrade.com