

Miramar Real Estate Management L.T.D. and

Miramar-uae.com
(miramaruae.com)

Privacy Policy (GPP)

under GDPR

Last modified 25 September 2024

1. General

This privacy notice informs you how MIRAMAR REAL ESTATE MANAGEMENT L.T.D. (“we”, “our”, or “us”) collect, use, share, retain and dispose personal data received through the miramar-uae.com(miramaruae.com) family of websites (“website”), by

calls, messages and our branded social media pages (such as our LinkedIn, Facebook, Instagram and Twitter pages) (“social media”). Our website and social media are hereinafter jointly referred to as “online platform”.

We operate our website on behalf of the listed top holding company Miramar (Group). Accordingly, our website is primarily designed for investors, residences and other persons (e.g., tenant and buyers) that are interested in our Group.

We may occasionally update this privacy notice. We encourage you to periodically review this privacy notice to be informed of how we process your information.

How do we collect your data?

You directly provide most of the data we collect. We collect data and process data when you:

- Register online or purchase a plan for any of our products or voluntarily complete an application form or provide information in relation to requesting an offer.
- Use or view our website via your browser’s
- Completing an application for services by personally visiting our offices
- By calling us or sending us messages via social media or messengers, emails and other means of communications
- By sending us images, videos, voice records

- By contacting our business partners and relative service providers such as maintenance companies, developers, property managements, advertisement companies and property portals, companies where we have agreement with them for services collaboration.

2. Data controller and contact details

MIRAMAR REAL ESTATE MANAGEMENT L.T.D. , with its registered office at Sky Tower, 1903, Abu Dhabi, UAE, is the data controller of our online platform and responsible for its operation.

For any data protection related comment or question you may have in connection with our online platform you can reach us by email at info@miramar-uae.com.

3. Details of processing

You can use our online platform without disclosing any personal data to us. Personal data means any information relating to an identified or identifiable natural person.

If you nevertheless voluntarily provide us with e.g., your name, e-mail address, phone number, country of residence or other personal data, we will process this personal data.

4. The types of personal data we may obtain

We may collect and receive the following personal data from you:

- Name and contact details (such as name, address, email, country of residence and phone numbers),
- Your image, audio and likeness (such as photographs and video recordings), and
- Personal data included in your traffic data (such as your browser, the IP address of your computer or device, your internet service provider, the site from which you navigated to our online platform, the duration of your visit to our online platform and what type of device you are using (e.g. a computer, smart phone or tablet and the respective operating system)).
- Personal data which we might require for the obtaining requests, viewing, deposits, agreements such as your Emirates ID, your Passport Copy, your Title Deed, your Utilities Bills and Service Charges, Bank Pre Approvals , and Statements, Bank Account Number, Cheques and other payments, if any of above is required by the processing team.

We may collect other types of personal data if required under applicable law or if necessary, for the purposes listed below.

5. Purposes and legal bases for processing

We may collect and process your personal data for the purposes and on the legal bases identified in the following:

Providing our online platform and delivering the services you have requested:

We may process your personal data to perform our services for you and to fulfill our obligations under the applicable [Terms of Use](#); if we have not entered into a contract with you, we base the processing of your personal data on our legitimate interest to operate and administer our online platform, also in order to help to enter an agreement and getting relevant approvals for real estate transactions, to provide you with content, service you access and request.

Handling contact and user support requests:

If you fill out a “contact-us” form or request user support, or if you contact us by other means including via a phone call, we may process your personal data to perform our contract with you and to the extent it is necessary for our legitimate interest in fulfilling your requests and communicating with you.

Sharing photographs and/or audio-visual footage taken and/or live streamed during our event, which is taken by you or our team:

We may process your image, audio and likeness taken and/or live-streamed during our event or after we receive it from you. These recordings, images can be published on our online platform as well as on the co-organizer's online platforms. Your images, audio and likeness may also be reproduced in various media including our publications, online platform and press to the extent it is necessary for our legitimate interest free of charge as well as for our promotional and business activities.

Developing and improving our online platform:

We may process your personal data to analyze trends and to track your usage of and interactions with our online platform to the extent it is necessary for our legitimate interest in developing and improving our online platform and providing our users with more relevant content and service offerings, or where we seek your consent.

Managing our relationship with you:

We may process your personal data to send you marketing information, product recommendations and other non-transactional communications about us and our partners, including information about our products, promotions, or events to the extent you have provided your prior consent. We are authorized to contact you by any means and as often as necessary, for an indefinite period, unless you withdraw your consent in writing.

Reviewing compliance with the applicable [Terms of Use](#) ; ensuring the security of our business, preventing or detecting fraud or abuses of our online platform:

We may process your personal data by tracking the use of our online platform, verifying accounts and activity, investigating suspicious activity, and enforcing our [Terms of Use](#) to the extent it is necessary

for our legitimate interest in promoting the safety and security of the online platform and in protecting our rights and the rights of others.

Defense and enforcement of claims:

We may use online data for civil and criminal legal action or defense in such proceedings. Within the scope of such procedures, your IP address may also be used for identification by the competent authorities, even if this initially has no personal reference for us.

Complying with legal obligations:

We may process your personal data when cooperating with public and government authorities, courts or regulators in accordance with our legal obligations under applicable laws to the extent this requires the processing or disclosure of personal data to protect our rights or is necessary for our legitimate interest in protecting against misuse or abuse of our online platform and services, protecting personal property or safety, pursuing remedies available to us and limiting our damages, complying with judicial proceedings, court orders or legal processes, respond to lawful requests, or for auditing purposes.

6. Data sharing

We may share personal data we collect and receive on a need-to-know basis with the following parties:

1. Other affiliates of our Group or its agents,
2. Third-party providers that perform services for us (we work with service providers at home and abroad who process data about you on our behalf or in joint responsibility with us, or receive data about you from us within their own

sphere of responsibility. For example, we procure IT services such as hosting, support and maintenance, and testing from service providers. Our service providers are each subject to contractual and/or statutory confidentiality and data protection obligations),

3. Competent public authorities or other third parties (if required by law or reasonably necessary to protect the rights, property and safety of ourselves or others).

We may also transfer your personal data in the event that we sell or transfer all or a portion of our business or assets, may be transferred as part of any merge, acquisition, sale of company assets, or transition of service to another provider, as well as in the unlikely event of any insolvency, bankruptcy, or receivership in which the information pursuant to this Policy would be transferred to another entity as a result of such a proceeding, you acknowledge and accept that the information pursuant to this Policy may form part of the transferred assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use personal data you have provided to us in a manner that is consistent with applicable law and this privacy notice.

7. Cross border transfers

We may transfer personal data we collected to third parties in countries outside of UAE . For example, your data may be processed worldwide if personal data is transmitted to online storage with servers abroad within our Group or to our service providers.

8. Links

Our online platform, emails, online generated files may contain links to other sites. We are not responsible for the content or privacy practices of such other sites. Pay attention when you leave our online platform and read the privacy notices of any other site that collects personal data. Your data protection and privacy rights under these third-party platforms will be governed by their respective privacy practices.

9. Use of technologies

We collect certain personal data by using cookies and similar technologies when you visit our online platform.

10. Security of processing

We handle our online platform data securely and take appropriate technical and organizational security measures to protect the confidentiality, integrity and availability of your personal data, to protect it against unauthorized or unlawful processing and to protect it against the risk of loss, accidental alteration, unauthorized disclosure or access. However, security risks cannot generally be ruled out completely; certain residual risks are unavoidable.

When your data is transmitted via our online platform, we protect it during transmission using suitable encryption mechanisms. However, we can only secure areas that are under our control. If you contact us by e-mail, you do so at your own risk and agree that we may respond to you at the sender's address via the same channel. If you send us e-mails via the Internet in unencrypted form, third parties may be able

to access, view and manipulate them, and data can be lost or intercepted and/or manipulated by third parties. What's more, we take appropriate technical and organizational security measures to reduce the risk on our online platform. However, your end device is outside the security area that lies within our control. You are therefore required to learn about the necessary safety precautions and to take appropriate measures in this regard.

11. Data retention

We retain your personal data for as long as necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements.

In connection with newsletter, marketing information, market updates or similar subscription services you have signed up to this for example generally means that we keep your data and use it up until you notify us that you no longer want to obtain the respective newsletter with information from us or receive our calls and messages.

After expiry of the applicable retention periods, all personal data will be destroyed, anonymized or deleted using secure technology. This technology depends on the application and storage media used. Expired records are identified based on their creation or last modification date, the current date and the retention period. If there is any data that we are unable, for technical reasons, to delete entirely from our systems, we will implement appropriate measures to prevent any further use of such data.

12. Job seekers

You will be automatically navigated to an independent IT-infrastructure if you apply for a job vacancy over our website. The job application process is subject to separate privacy notices than those of our website. They are automatically displayed when you apply for a job online.

13. Your rights

You have various rights in connection with our data processing subject to applicable law:

- the right to request information from us as to whether we are processing your data, and which data we are processing,
- the right of data rectification (if your data is inaccurate),
- the right of erasure (if the retention of your data is no longer necessary in relation to the envisaged purpose of the processing),
- the right to object to our processing for specific purposes and to request the restriction or deletion of data unless we are obliged or entitled to continue processing it,
- the right to revoke consent, provided our processing is based on your consent (the right to withdraw your consent is not retroactive. Any processing operations which took place before you revoked your consent will not become illegal on withdrawal.),
- the right to data portability, and

- the right to lodge a complaint with the competent supervisory authority after announcing your personal data withdrawal to us with legitimate reason and with our acceptance.

To exercise these rights, please contact us using our contact details set out below. We may request you to provide a copy of your ID card or otherwise evidence of your identity. To the extent legally permissible, in particular to protect the rights and freedoms of other data subjects and to safeguard sensitive interests, we may also reject your request in whole or in part (for example, by blacking out certain content relating to third parties or our trade secrets).

We will respond to your request within the applicable statutory term.

14. Contact details

If you have any comments or inquiries about the information in this privacy notice, or if you want to exercise your rights, please contact us by email at info@miramar-uae.com.

15. Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology. For further information, visit allaboutcookies.org.

How do we use cookies?

Our uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website

There are a number of different types of cookies, however, our website uses:

- **Functionality** – we use these cookies so that we recognize you on our website and remember your previously selected. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- **Advertising** – we use these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP sometimes shares some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you

visit another website, you may be shown advertising based on your browsing patterns on our website.

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

16. Privacy Policy to other websites

Our website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

17. Changes of Privacy Policy

We keep its privacy policy under regular review and place any updates on this web page.