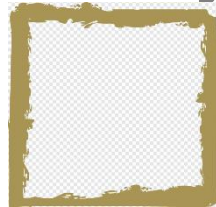


Information Technology Privacy Policy



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Document Control:

Revision History

Revision	Revision Date	Document Owner	Reviewed by	Approved by
Rev 0	29/09/2024	Technology Dept	Rinesh Nanu	
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Table 1

Our Privacy Policy was last updated on 13th October 2024

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Statement:

This Privacy Policy applies to all customers, clients, and users interacting with Doha Oasis Investment Company and its affiliated entities. All individuals providing personal data through our services, applications, or platforms are required to comply with the guidelines outlined in this policy. Non-compliance with this policy may result in restricted access to our services and potential legal consequences, as deemed necessary.

Purpose:

Purpose of the Privacy Policy

This Privacy Policy is designed to inform customers about how Doha Oasis Investment Company collects, uses, discloses, and protects personal data. Our commitment to safeguarding your information aligns with applicable data protection laws, including Qatari Law No. 13 of 2016, the General Data Protection Regulation (GDPR), and the California Consumer Privacy Act (CCPA). This policy outlines your rights regarding your personal data and our obligations in handling that data responsibly.

Terminology Used in This Policy

A. Interpretation and Definitions

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

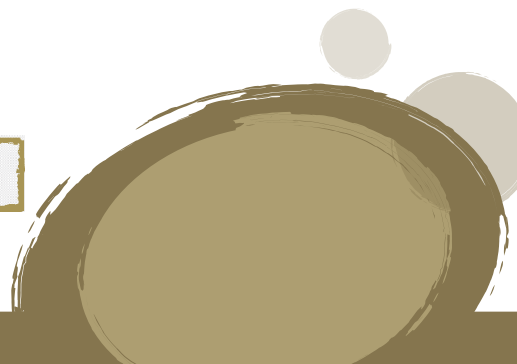
Definitions

To ensure clarity, the following terms are defined as they pertain to this Privacy Policy:

- "Account" means a unique account created for You to access our Service or parts of our Service.
- "Business", refers to the Company as the legal entity that collects clients' personal information and determines the purposes and means of the processing of Clients' personal information, or on behalf of which such information is collected and that alone, or jointly with others, determines the purposes and means of the processing of Clients' personal information.
- "Company" (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Doha Oasis Investment Company, located at Doha, Musheireb, Zone 13, Al Khaleej Street # 221, MCR Floor, Building Number 42.
- "Country" refers to State of Qatar.

- "Client", means a natural person who is a Qatari resident. A resident, as defined in the law, includes (1) every individual who is in Qatar for other than a temporary or transitory purpose, and (2) every individual who is domiciled in / or outside Qatar for a temporary or transitory purpose.
- "Cookies" are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- "Data Controller" refers to the Company as the legal person which alone or jointly with others determines the purposes and means of the processing of Personal Data.
- "Device" means any device that can access the Service such as a computer, a cell phone or a digital tablet.
- "Personal Data"
 - Any information that relates to an identified or identifiable individual.
 - Any information relating to You such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.
 - Any information that identifies, relates to, describes or is capable of being associated with, or could reasonably be linked, directly or indirectly, with You.
- "Sale", means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a clients' personal information to another business or a third party for monetary or other valuable consideration.
- "Service" refers to the Website.
- "Service Provider" means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.
- "Usage Data" refers to data collected automatically, either generated using the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- "Website" refers to [dohaoasis.com](https://www.dohaoasis.com), accessible from any browser at <https://www.dohaoasis.com>
- "You" means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.
- "Processing" refers to any operation or set of operations performed on personal data, such as collection, storage, use, disclosure, and deletion.
- "Data Subject" is an individual whose personal data is processed by our organization.

- “Data Processor” is a third party that processes personal data on behalf of the data controller, under specific contractual obligations.
- “Consent” refers to a clear indication of the data subject's wishes, by which they signify agreement to the processing of their personal data.
- “Third Parties” are individuals or entities that are not the data subject, data controller, or data processor but may have access to personal data as part of their services or business arrangements.



Policy:

Collecting and Using Your Personal Data

B. Types of Data Collected

B.1.1 Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- ✓ Email address
- ✓ First name and last name
- ✓ Phone number
- ✓ Address, State, Province, ZIP/Postal code, City
- ✓ Usage Data
- ✓ Others (TBC)

B1.2 Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

B.1.3 Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service. The technologies We use may include:

- **Cookies or Browser Cookies.** A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.
- **Web Beacons.** Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

We use both **Session** and **Persistent** Cookies for the purposes set out below:

- **Necessary / Essential Cookies**
Type: Session Cookies
Administered by: Us
Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.
- **Cookies Policy / Notice Acceptance Cookies**
Type: Persistent Cookies
Administered by: Us
Purpose: These Cookies identify if users have accepted the use of cookies on the Website.
- **Functionality Cookies**
Type: Persistent Cookies
Administered by: Us
Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

- **Tracking and Performance Cookies**

Type: Persistent Cookies

Administered by: Third-Parties

Purpose: These Cookies are used to track information about traffic to the Website and how users use the Website. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the Website. We may also use these Cookies to test new pages, features or new functionality of the Website to see how our users react to them.

C. Use of Your Personal Data

The Company may use Personal Data for the following purposes:

- **To provide and maintain our Service**, including to monitor the usage of our Service. To manage Your Account: to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- **For the performance of a contract**: the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.
- **To contact You**: To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide You with news**, special offers and general information about other goods, services and events which we offer that are like those that you have already purchased or enquired about unless You have opted not to receive such information.
- **To manage Your requests**: To attend and manage Your requests to Us.
- **For business transfers**: We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.
- **For other purposes**: We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.

We may share Your personal information in the following situations:

- **With Service Providers:** We may share Your personal information with Service Providers to monitor and analyze the use of our Service, for payment processing, to contact You.
- **For business transfers:** We may share or transfer Your personal 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.
- **With Affiliates:** We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **With business partners:** We may share Your information with Our business partners to offer You certain products, services or promotions.
- **With other users:** when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.

D. Retention of Your Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

E. Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

F. Disclosure of Your Personal Data

The Company may disclose your personal data for the following unlimited purposes:

F.1 Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

F.2 Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities.

F.3 Data Breach Notification

In the unfortunate event of a data breach that compromises your personal information, we are committed to notifying you and relevant authorities without undue delay, as stipulated by applicable data protection laws. Our notification will include:

- 1.1 Nature of the Breach: A description of the breach and the types of personal data involved.
- 1.2 Consequences: An assessment of the likely consequences of the breach for affected individuals.
- 1.3 Protective Steps: Guidance on actions you can take to protect yourself, such as monitoring your accounts or changing passwords.

We take data breaches seriously and have protocols in place to manage and mitigate risks effectively.

G. Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security taking in to consideration the developed fraud, piracy, hacking, and phishing actions worldwide.

H. Detailed Information on the Processing of Your Personal Data

The Service Providers We use may have access to Your Personal Data. These third-party vendors collect, store, use, process and transfer information about Your activity on Our Service in accordance with their Privacy Policies.

I. Analytics

We may use third-party Service providers to monitor and analyze the use of our Service, if needed.

J. Email Marketing

We may use Your Personal Data to contact You with newsletters, marketing or promotional materials and other information that may be of interest to You. You may opt-out of receiving any, or all, of these communications from Us by following the unsubscribe link or instructions provided in any email We send or by contacting Us.

K. Payments

We may provide paid products and/or services within the Service. In that case, we may use third-party services for payment processing (e.g. payment processors).

We will not store or collect Your payment card details. That information is provided directly to Our third-party payment processors whose use of Your personal information is governed by their Privacy Policy.

L. Legal Basis for Processing Personal Data

We may process Personal Data under the following conditions:

- **Consent:** You have given Your consent for processing Personal Data for one or more specific purposes.
- **Performance of a contract:** Provision of Personal Data is necessary for the performance of an agreement with You and/or for any pre-contractual obligations thereof.
- **Legal obligations:** Processing Personal Data is necessary for compliance with a legal obligation to which the Company is subject.
- **Vital interests:** Processing Personal Data is necessary in order to protect Your vital interests or of another natural person.
- **Public interests:** Processing Personal Data is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Company.
- **Legitimate interests:** Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the Company.

In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

M. Your Rights

In alignment with Qatari Law No. 13 of 2016, the General Data Protection Regulation (GDPR), and the California Consumer Privacy Act (CCPA), users are entitled to specific rights regarding the handling and processing of their personal data. These rights are designed to empower individuals and provide them with control over their personal information.

The Company undertakes to respect the confidentiality of Your Personal Data and to guarantee You can exercise Your rights. Hereby, Our Privacy Policy provides specific rights regarding their personal information as per the following:

You have the right under this Privacy Policy, and by law to:

- **Request access to Your Personal Data.** The right to access, update or delete the information We have on You. Whenever made possible, you can access, update or request deletion of Your Personal Data directly within Your account settings section. If you are unable to perform these actions yourself, please contact Us to assist You. This also enables You to receive a copy of the Personal Data We hold about You. This right includes:
 - Transparency: Information on what personal data is being collected.
 - Purpose of Processing: Clarity on the reasons for processing the data.
 - Third-Party Sharing: Disclosure of any third parties with whom the data may be shared.
- **Request correction of the Personal Data that We hold about You.** You have the right to have any incomplete or inaccurate information We hold about You corrected. Object to processing of Your Personal Data. This right exists where We are relying on a legitimate interest as the legal basis for Our processing and there is something about Your particular situation, which makes You want to object to our processing of Your Personal Data on this ground. You also have the right to object to where We are processing Your Personal Data for direct marketing purposes.
- **Request erasure of Your Personal Data. ("Right to be Forgotten")** You have the right to ask Us to delete or remove Personal Data when there is no good reason for Us to continue processing it.
Request the transfer of Your Personal Data. We will provide to You, or to a third-party You have chosen, Your Personal Data in a structured, commonly used, machine-readable format. Please 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 carry out a contract with You.

Users may request the deletion of their personal data under several conditions, including:

- When the data is no longer necessary for its original purpose.
 - If the user withdraws consent for processing.
 - If the user objects to the processing of their data.
- **Withdraw Your consent.** You have the right to withdraw Your consent on using your Personal Data. If You withdraw Your consent, We may not be able to provide You with access to certain specific functionalities of the Service.

- **The right to notice.** You have the right to be notified which categories of Personal Data are being collected and the purposes for which the Personal Data is being used.
- **The right to request.** You have the right to request that We disclose information to You about Our collection, use, sale, disclosure for business purposes and share of personal information. Once We receive and confirm Your request, We will disclose to You:
 - The categories of personal information We collected about You
 - The categories of sources for the personal information We collected about You
 - Our business or commercial purpose for collecting or selling that personal information
 - The categories of third parties with whom We share that personal information
 - The specific pieces of personal information We collected about You
 - If we sold Your personal information or disclosed Your personal information for a business purpose, We will disclose to You:
 - ✓ The categories of personal information categories sold
 - ✓ The categories of personal information categories disclosed
- **The right to say no to the sale of Personal Data (opt-out).** You have the right to direct Us to not sell Your personal information. To submit an opt-out request please contact Us.
- **The right to delete Personal Data.** You have the right to request the deletion of Your Personal Data, subject to certain exceptions. Once We receive and confirm Your request, We will delete (and direct Our Service Providers to delete) Your personal information from our records, unless an exception applies. We may deny Your deletion request if retaining the information is necessary for Us or Our Service Providers to:
 - Complete the transaction for which We collected the personal information, provide a good or service that You requested, take actions reasonably anticipated within the context of our ongoing business relationship with You, or otherwise perform our contract with You.
 - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
 - Debug products to identify and repair errors that impair existing intended functionality.
 - Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
 - Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if You previously provided informed consent.
 - Enable solely internal uses that are reasonably aligned with Client expectations based on Your relationship with Us.
 - Comply with a legal obligation.
 - Make other internal and lawful uses of that information that are compatible with the context in which You provided it.
- **The right not to be discriminated against.** You have the right not to be discriminated against for exercising any of Your client's rights, including by:
 - Denying goods or services to You

- Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties
 - Providing a different level or quality of goods or services to You
 - Suggesting that You will receive a different price or rate for goods or services or a different level or quality of goods or services
- **Right to Data Portability.** Users have the right to obtain their personal data in a structured, commonly used, and machine-readable format. Additionally, they can request that we transmit their data to another data controller, provided that such a transfer is technically feasible. This right facilitates the seamless transfer of personal information between services.
 - **Right to Object.** Users can object to the processing of their personal data, particularly in cases of direct marketing or profiling. Upon receiving an objection, we will halt the processing unless we can demonstrate compelling legitimate grounds for continuing the processing that override the user's interests, rights, and freedoms.
 - **Right to Lodge a Complaint** If users believe that their data protection rights have been infringed upon, they have the right to lodge a complaint with a supervisory authority. In Qatar, this would be the Qatari Data Protection Office. We encourage users to reach out to us directly first, as we are committed to resolving any issues related to personal data handling.

These rights are designed to ensure transparency, fairness, and accountability in how your personal data is handled, aligning with the principles outlined in the data protection laws.

N. Exercising of Your Data Protection Rights

You may exercise Your rights of access, rectification, cancellation and opposition by contacting Us. Please note that we may ask You to verify Your identity before responding to such requests. If You make a request, We will try our best to respond to You as soon as possible.

- In order to exercise any of Your rights under this Policy, You can contact Us:
- By visiting this page on our website: <https://www.dohaoasis.com/compliance-reporting>
- By sending us an email: compliance@dohaoasis.com
- By calling Us: +974 4410 4100

Only You, or a person that You authorize to act on Your behalf, may make a verifiable request related to Your personal information.

Your request to Us must:

- Provide sufficient information that allows Us to reasonably verify You are the person about whom We collected personal information or an authorized representative
- Describe Your request with sufficient detail that allows Us to properly understand, evaluate, and respond to it

We cannot respond to Your request or provide You with the required information if we cannot:

- Verify Your identity or authority to make the request
- And confirm that the personal information relates to You
- We will disclose and deliver the required information within 14 days of receiving Your verifiable request. The time period to provide the required information may be extended once by an additional 14 days when reasonably necessary and with prior notice.

Any disclosures We provide will only cover the 3 months period preceding the verifiable request's receipt.

- For data portability requests, We will select a format to provide Your personal information that is readily usable and should allow You to transmit the information from one entity to another entity without hindrance.

0. Categories of Personal Information Collected

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Client or Device. The following is a list of categories of personal information which we may collect.

Please note that the categories and examples provided in the list below does not mean that all examples of that category of personal information were in fact collected by Us but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been collected. For example, certain categories of personal information would only be collected if You provided such personal information directly to Us.

- **Category A: Identifiers.**

Examples: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, driver's license number, passport number, or other similar identifiers.

- **Category B: Personal information**

Examples: A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.

- **Category C: Protected classification characteristics**

Examples: Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual

orientation, veteran or military status, genetic information (including familial genetic information).

- **Category D: Commercial information.**

Examples: Records and history of products or services purchased or considered.

- **Category E: Biometric information.**

Examples: Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.

- **Category F: Internet or other similar network activity.**

Examples: Interaction with our Service or advertisement.

- **Category G: Geolocation data.**

Examples: Approximate physical location.

- **Category H: Sensory data.**

Examples: Audio, electronic, visual, thermal, olfactory, or similar information.

- **Category I: Professional or employment-related information.**

Examples: Current or past job history or performance evaluations.

- **Category J: Non-public education information**

Examples: Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

- **Category K: Inferences drawn from other personal information.**

Examples: Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Under Our Policy, personal information does not include:

- Publicly available information from government records
- Deidentified or aggregated information
- Information excluded from Our Policy scope.

P. Sources of Personal Information

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from You. For example, from the forms You complete on our Service, preferences You express or provide through our Service, or from Your purchases on our Service.
- Indirectly from You. For example, from observing Your activity on our Service.
- Automatically from You. For example, through cookies We or our Service Providers set on Your Device as You navigate through our Service.
- From Service Providers. For example, third-party to monitor and analyze the use of our Service, third-party for payment processing, or other third-party that We use to provide the Service to You.

Q. Use of Personal Information for Business Purposes or Commercial Purposes

We may use or disclose personal information We collect for "business purposes" or "commercial purposes", which may include the following examples:

- To operate our Service and provide You with our Service.
- To provide You with support and to respond to Your inquiries, including to investigate and address Your concerns and monitor and improve our Service.
- To fulfill or meet the reason You provided the information. For example, if You share Your contact information to ask a question about our Service, We will use that personal information to respond to Your inquiry. If You provide Your personal information to purchase a product or service, We will use that information to process Your payment and facilitate delivery.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- For internal administrative and auditing purposes.
- To detect security incidents and protect against malicious, deceptive, fraudulent or illegal activity, including, when necessary, to prosecute those responsible for such activities.

Please note that the examples provided above are illustrative and not intended to be exhaustive. For more details on how we use this information, please refer to the "Use of Your Personal Data" section.

If We decide to collect additional categories of personal information or use the personal information We collected for materially different, unrelated, or incompatible purposes We will update this Privacy Policy.

R. Disclosure of Personal Information for Business Purposes or Commercial Purposes

We may use or disclose the following categories of personal information for business or commercial purposes:

- Category A: Identifiers
- Category B: Personal information
- Category D: Commercial information
- Category F: Internet or other similar network activity

Please note that the categories listed above are those defined in "Categories of Personal Information Collected".

This does not mean that all examples of that category of personal information were in fact disclosed but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been disclosed.

When We disclose personal information for a business purpose or a commercial purpose, We enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

S. Sale of Personal Information

As defined, "sell" and "sale" mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for valuable consideration. This means that We may have received some kind of benefit in return for sharing personal information, but not necessarily a monetary benefit.

Please note that the categories listed below are those defined in this Policy. This does not mean that all examples of that category of personal information were in fact sold, but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been shared for value in return.

We may sell the following categories of personal information:

- Category A: Identifiers
- Category B: Personal information categories
- Category D: Commercial information
- Category F: Internet or another similar network activity

S.1 Share of Personal Information

We may share Your personal information identified in the above categories with the following categories of third parties:

- Service Providers
- Payment processors
- Our affiliates
- Our business partners
- Third party vendors to whom You or Your agents authorize Us to disclose Your personal information in connection with products or services We provide to You

S.2 Do Not Sell My Personal Information Policy

You have the right to opt-out of the sale of Your personal information. Once We receive and confirm a verifiable consumer request from You, we will stop selling Your personal information. To exercise Your right to opt-out, please contact Us.

The Service Providers we partner with (for example, our analytics or advertising partners) may use technology on the Service that sells personal information as defined. If you wish to opt out of the use of Your personal information for interest-based advertising purposes and these potential sales as defined, you may do so by contacting Us on the below mentioned ways of contacts.

Please note that any opt out is specific to the browser You use. You may need to opt out on every browser that You use.

T. Children's Privacy

Our Service does not address anyone minor or under the age of 13. We do not knowingly collect personally identifiable information from anyone minor or under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone minor or under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

To request removal of such data, You can contact Us using the contact information provided below, and include the email address associated with Your account.

Be aware that Your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

U. Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third-party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

V. Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

W. Contact Us

If you have any questions about this Privacy Policy, You can contact us:

- By visiting our website: <https://www.dohaoasis.com/compliance-reporting>
- By sending us an email: compliance@dohaoasis.com
- By calling mobile number: +974 4410 4100

X. Security Measures

To safeguard your personal data from unauthorized access, loss, alteration, or misuse, we have established comprehensive technical and organizational security measures. Our approach is designed to ensure the confidentiality, integrity, and availability of your information. The key components of our security measures include:

X.1 Encryption of Sensitive Data

We utilize advanced encryption techniques to protect sensitive personal data both during transmission and storage. This ensures that:

X.1.1 Data in Transit: When personal data is transmitted over networks, it is encrypted to prevent interception by unauthorized parties. This is particularly critical when sensitive information is exchanged through online forms or communications.

X.1.2 Data at Rest: Personal data stored in our systems is encrypted, adding an additional layer of protection against unauthorized access. Even if the data were to be compromised, encryption would make it significantly more difficult to decipher.

X.2 Access Controls

We enforce strict access control measures to limit access to personal data to only those personnel who require it for their job functions. This includes:

X.2.1 Role-Based Access: Access to personal data is granted based on the specific roles and responsibilities of employees. Only authorized personnel who need access for legitimate business purposes are permitted to view or handle personal information.

X.2.2 Authentication Protocols: We implement strong authentication measures, such as multi-factor authentication (MFA), to verify the identity of users accessing our systems. This helps prevent unauthorized access, even in the event of credential compromise.

X.3 Regular Security Assessments

To maintain and enhance the effectiveness of our security measures, we conduct regular security assessments, which include:

X.3.1 Audits: Periodic audits are performed to evaluate our compliance with established security policies and procedures. These audits help identify any potential vulnerabilities or areas for improvement.

X.3.2 Vulnerability Testing: We conduct vulnerability assessments and penetration testing to proactively identify and address security weaknesses in our systems. This testing simulates potential attack scenarios to ensure our defenses are robust and effective.

By implementing these security measures, we are committed to protecting your personal data and ensuring that it is handled with the utmost care and responsibility. We continuously review and update our security practices to address emerging threats and comply with evolving legal requirements.

Y. Third-Party Data Sharing

We may share your personal data with trusted third parties for various purposes essential to our operations. This sharing is conducted with strict adherence to data protection standards to ensure your information remains secure. The categories of third parties with whom we may share your data include:

Y.1 Service Providers: We engage service providers who assist us in operational tasks, such as payment processing, reservation systems, and customer support. These providers are required to implement appropriate security measures and can only process your data as per our instructions.

Y.2 Business Partners: We may collaborate with business partners for loyalty programs, promotions, or enhanced customer service. In these cases, data sharing will be governed by agreements that stipulate the intended use of your information and ensure compliance with data protection laws.

Y.3 Legal and Regulatory Authorities: In instances where we are mandated by law to share your information, such as for compliance with a legal obligation or a regulatory investigation, we will disclose your data to the appropriate authorities while ensuring minimal disclosure necessary for compliance.

We prioritize the privacy and security of your personal data when sharing it with third parties and will only do so for agreed-upon purposes that align with this policy.

Z. Contact Information

For any inquiries, concerns, or requests pertaining to this Privacy Policy, particularly those related to electronic data or the management of your personal information within our computer systems, please contact our Information Data Governance Officer (IDGO). The IDGO is tasked with overseeing our electronic data protection strategy and ensuring compliance with relevant regulations. You can reach our IDGO at the following address:

Information Data Governance Officer

- Email: rinesh.nanu@dohaoasis.com
- Phone: +974 44104102
- Address: Doha Oasis, Al Khaleej Street, Musherib, Doha, Qatar. P.O.Box: 7800

AA. Data Minimization and Purpose Limitation

We adhere to the principles of data minimization and purpose limitation, ensuring that the personal data we collect is:

- Relevant:** We only collect data that is pertinent to our operational needs and the services we provide.
- Adequate:** The data collected must be adequate to achieve the intended purpose without being excessive.

- c. Limited: We restrict our data collection to what is necessary to fulfill the specific purposes for which the data is processed.

Additionally, we retain your personal data only for as long as necessary to achieve the purposes outlined in this policy or to comply with legal obligations. Once your data is no longer needed for these purposes, we will securely delete or anonymize it in accordance with our data retention policies.