

GENERAL DATA PROTECTION POLICY

1. DEFINITIONS USED IN THIS POLICY

In this Policy, the following terms have the following meanings:

"Data controller" means a person or organisation who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information is, or is to be, handled.

"Data processor" means any person (other than an employee of the data controller) who handles personal information on behalf of the data controller.

"Data handling" means in relation to personal information, any collection, processing or use of that information, for example recording, updating or amending, creating reports, looking at the information, erasing, destroying or blocking the information. It also includes any transfer. Viewing the information remotely through a web portal is considered to be processing of that information. If the person viewing the information is located in a different country it is treated as a transfer of that information to the country in which that person is located.

"MEIRA" means the Middle East Investor Relations Association.

"Personal information" means information relating to a person from which that person can be identified (whether alone or in conjunction with other information). This definition is very broad and includes: names, work and home addresses, company e-mail addresses (e.g. joe.bloggs@Company.com), direct-dial telephone numbers, web browsing data obtained through cookies, IP addresses, statements of opinion about an individual written in emails, photographs, and information about individuals obtained through social media. If in doubt about whether something is personal information, please consult with the Data Protection Officer.

"Person" means the individual whose personal information is being handled.

"Sensitive personal information" means information about a person relating to any of the following:

- Race or ethnic origin of the person;
- Sexual life or sexual orientation of the person;
- Political opinions of the person;
- Religious beliefs or beliefs of a similar nature of the person;
- Philosophical beliefs of the person;
- Trade union membership – whether or not he or she is a member;
- Physical or mental health or condition of the person; or
- Genetic or biometric data.

2. DATA PROTECTION BASICS

We adhere to the General Data Protection Regulation ("**GDPR**"). This sets out six general principles, which require that personal information is:

- processed fairly, lawfully and in a transparent manner ("**lawfulness, fairness and transparency**");
- collected only for specific, explicit and legitimate purposes, and not further handled in a manner which is incompatible with those purposes ("**purpose limitation**");
- adequate, relevant, and limited to those details which are necessary for the purposes for which the data is being handled ("**data minimisation**");
- collected accurately, verified and kept up to date ("**accuracy**");
- deleted or anonymised once it is no longer necessary for the purposes for which it is being handled (see MEIRA's Data Retention Policy for further details) ("**storage limitation**"); and
- stored and used securely, in order to prevent accidental destruction, damage, or loss, or unauthorised or unlawful access, use, or disclosure ("**integrity and confidentiality**").

Further details on how MEIRA ensures compliance with these principles is set out below.

In addition to these broad principles:

- individuals have extensive rights to control how their personal information may be used; and
- MEIRA must be able to demonstrate that it is complying with the law ("**accountability**").

If you believe that the way you handle any personal information in the course of your employment with MEIRA does not meet the standards set out in this policy, you should contact MEIRA's General Manager as soon as possible at info@meira.me. Contact details for MEIRA's General Manager are available on the MEIRA privacy notice and website.

If you think that there may have been an IT security breach, or that personal information may have been lost, damaged, or accessed without authorisation, it is of paramount importance that you inform MEIRA's General Manager immediately.

3. COMPLYING WITH DATA PROTECTION LAWS IN PRACTICE

MEIRA has put in place measures throughout its business to help achieve compliance with data protection laws.

General measures include:

- ensuring that MEIRA's General Manager monitors and assists with the implementation of data protection compliance. You should ensure all queries in relation to data protection matters are directed to MEIRA's General Manager.

- where relevant, employees will undergo data protection training to ensure they understand the requirements set out under data protection laws and in this Policy. Employees who have not received data protection training but feel that they require such training, should contact MEIRA's General Manager.
- each department within MEIRA will establish physical and electronic storage systems that ensure personal information is held securely, accessed on a business need to know basis, and deleted in accordance with MEIRA's Data Retention Policy.
- MEIRA will conduct regular audits of the systems and processes in place to assess the overall approach to compliance and whether any changes in the way MEIRA handles personal information necessitate such systems and processes being updated.
- New ways of handling personal information which are likely to present high risks are only implemented after a data protection impact assessment has been carried out, in order to ensure that they are lawful and to determine ways of mitigating any risks. If necessary, the relevant data protection authority will also be consulted.

Specific measures are also in place to address each of the six data protection principles referred to above.

3.1 **Lawfulness, fairness and transparency**

This principle encompasses several elements.

(a) **Transparency and fairness**

MEIRA is required to obtain personal information fairly and not to mislead or deceive persons as to how their personal information will be used.

In particular, individuals must be provided with all of the following whenever their personal information is handled by MEIRA (unless they already have it, for example through MEIRA's website privacy policy):

- the **identity** and **contact details** of the **MEIRA entity** who will be holding their personal information;
- the **contact details** of the person responsible at MEIRA for data protection;
- the purpose or **purposes** of any data handling;
- the **legal ground** on which the data handling is based (see further section 3.1(b) below);
- if the data handling is based on the person's consent, the fact that the person has the **right to withdraw their consent** at any time;
- if the data handling is based on a legitimate interest, **what that legitimate interest is**;
- the **recipients or categories of recipients** that MEIRA shares personal information with;

- if applicable, the fact that personal information will be **transferred outside of the EEA**; whether the destination country has been deemed to adequately protect personal information by the European Commission; and if applicable the means that have been used to protect the personal information in the destination country (for example Model Clauses) and how the individual can obtain a copy of them;
- The **time period** for which the personal information will be kept, or if that is impossible to definitively state, the criteria which will be used to determine that time period;
- the fact that the person has **rights to access, rectify, erase, restrict and object** to the handling of their personal information which is held by MEIRA;
- the fact that the person may **complain to a data protection authority** about how their personal information is handled;
- whether the person's personal information will be **used to make automatic decisions about them** which affect them legally or similarly, and if so meaningful information about the logic involved and the significance and envisaged consequences for the person;
- Whether the person's sensitive personal data will be used to make automatic decisions about them, and if so meaningful information about the logic involved and the significance and envisaged consequences for the person;
- where personal information is collected directly from the person, **whether responses** to requests for personal information are **voluntary or obligatory**, and the **consequences of refusing** to provide obligatory responses to requests for personal information; and
- where personal information is not collected directly from the person, the **source** of the personal information (or, if this is not possible, at least general information about the sources).

Where personal information is collected directly from the person, this information must be provided **at the time of collection**.

Where it is collected from other sources, this information must be provided **as soon as possible** and at the latest:

- **one month** after MEIRA receives the personal information;
- at the time of **first communication** with the person; or
- at the time MEIRA **gives the personal information to anyone else**.

In order to ensure that these obligations are being met, MEIRA requires all employees to comply with the procedures in place across MEIRA to ensure personal information is fairly obtained, including, where necessary, making use of privacy notices to inform employees, clients, contractors, consultants, candidates, supporters, volunteers and other individuals how their personal information is handled.

Sometimes it will be sufficient simply to make this information generally available (for example on MEIRA's website privacy policy). However, **the right to object to direct marketing, and the right to object to processing based on legitimate interest or public interest, must always be explicitly drawn to the person's attention.**

Sometimes it will also be necessary to draw individuals' attention to other information as well. If you are in any doubt as to whether a person has been adequately informed about how their personal information will be used, consider the following question: would they be surprised if you informed them of the particular purpose or purposes in question? If yes, MEIRA should bring that person's attention to the particular purpose, even if this is by a simple e-mail or letter.

If you believe that a particular privacy notice does not set out the full extent of data handling undertaken by MEIRA, please contact MEIRA's General Manager.

(b) **Legal ground for handling personal information**

Data protection laws set out certain conditions, at least one of which must be met by MEIRA, in order for personal information to be regarded as fairly and lawfully handled. As noted above, MEIRA has to inform individuals which of these legal grounds the handling of their personal information is based on.

Personal information cannot be handled by MEIRA unless:

- the person who is the subject of the information has given his/her **consent** for their data to be handled for one or more specific purposes (although note that there are very strict standards for what counts as consent – please see further section 3.1(e) below);
- the handling is **necessary for the performance of a contract** with the person who is the subject of the information, or for the entering into or terminating of a contract with that person;
- the handling is necessary for **compliance with any legal obligation** arising under European Union or European Member State law;
- the handling is necessary to protect the **vital interests** of the person or a third party (note that this condition is only rarely applicable, usually in medical emergencies);
- the handling is necessary for the performance of a task carried out **in the public interest**; or
- the handling is necessary for **legitimate interests** pursued by MEIRA or a third party, except where those interests are overridden by the rights or legitimate interests of the person to which the personal information relates (this is particularly likely when the person is a child).

If you are in any doubt as to whether one of the above conditions has been satisfied, please contact MEIRA's General Manager.

(c) **Legal ground for handling sensitive personal information**

The collection of sensitive personal information is treated more strictly under data protection laws. Where you are required to handle any sensitive personal information, you should be aware that in addition to compliance with one of the basic conditions specified above, one of the additional conditions set out below must also be met:

- the person has given his/her **explicit consent** for the data to be handled for one or more specific purposes; or
- in relation to employee personal information, the handling is necessary to enable MEIRA to exercise its **rights or obligations in connection with employment** (for example, processing health data for statutory sick pay purposes); or
- the handling is necessary to protect the **vital interest** and/or life of the person (e.g. in life and death situations); or
- the personal information has been **manifestly made public** as a result of steps deliberately taken by the person; or
- the handling is necessary for the purposes of **establishing, exercising or defending legal claims**; or
- the handling is necessary for reasons of **substantial public interest** based on European Union or Member State law or in the area of public health; or
- the handling is necessary for **medical purposes** and is undertaken by a health professional (or equivalent); or
- for archiving purposes in the public interest, for scientific and historical research purposes, or for statistical purposes (if authorised under local laws).

If you are in any doubt as to whether one of the above conditions has been satisfied, please contact MEIRA's General Manager.

(d) **Legal ground for processing records of criminal convictions or offences**

Records of criminal convictions or offences cannot legally be handled by MEIRA unless specifically authorised by European Union or local laws. If you are in any doubt about this, please contact MEIRA's General Manager.

(e) **Consent**

As explained above, consent is one legal ground on which personal information can be handled. However, European data protection laws set out very strict standards for what constitutes consent. In order for consent to be valid:

- it must be **freely given** (eg the person must be free to say no);
- it must be **specific** to particular purposes (eg 'I consent to you using my email to send me job opportunities');)

- it must be given through **affirmative action** (so pre-ticked boxes are not sufficient);
- it must be **informed** – so persons must be aware of the implications of what they are consenting to;
- Persons must be informed that they can withdraw consent before they give it, and it must be as easy to withdraw consent as to give it; and
- Persons must be able to consent separately to different processing operations where this is appropriate.

In addition:

- consent will generally be invalid if the person cannot obtain a service unless they give their consent to certain handling of their personal information;
- for children under 16, consent must generally be obtained from the parent or legal guardian; and
- MEIRA must be able to demonstrate that they have obtained valid consent.

If you are relying on consent to handle personal information and you are unsure whether it meets any of these conditions, please contact MEIRA's General Manager.

3.2 Purpose limitation

Personal information must only be obtained and stored in accordance with the purposes specified in privacy notices, which include:

- Staff Administration (for example payroll, provision of benefits, performance reviews, training);
- Advertising, Marketing & Public Relations (for example, keeping clients and candidates informed about MEIRA's services); and
- Accounts & Records (for example staff planning and resource allocation across MEIRA, and keeping records of dealings with clients);

If you become aware of any additional purposes which you believe may not fall within the terms of a privacy notice, you should report such additional purposes to MEIRA's General Manager.

3.3 Data minimisation

The personal information handled by MEIRA must be adequate, relevant and not excessive for MEIRA's legitimate business purposes. Methods of collecting personal information must:

- be **specific to the particular purpose** for which MEIRA is collecting the information in question. For example, if MEIRA asks candidates it has successfully placed to fill out a feedback form to better understand how it can improve its services, the form should not ask for information which is irrelevant for this purpose, eg details of the individual's new colleagues.

- **not collect personal information that is simply "nice to have"**, which is otherwise not necessary for the purpose for which the person has provided their details, or which is to be used for another purpose (eg marketing) about which the person has not been informed and/or has not consented (if consent is required). For example, it would not be appropriate to keep details of a candidate's ethnicity on file (unless required for diversity monitoring), because MEIRA does not need this information in order to carry out its business operations.

Personal information should also not be held for longer than is necessary for the purposes for which it is used. See 'storage limitation' at section 3.5 below for further information on this.

3.4 **Accuracy**

You should comply with all procedures put in place by MEIRA to make sure that the personal information it handles is kept accurate and up to date.

If you become aware that personal information handled by MEIRA about its employees, clients, contractors, consultants, candidates, supporters, volunteers and any other individuals is inaccurate or out of date, please update or remove the relevant personal information if possible. Personal information relating to employees is managed centrally by MEIRA and any request to update or remove such personal information should be directed accordingly. MEIRA maintains systems and processes which allow consultants to directly update or remove personal information concerning clients and candidates.

MEIRA's General Manager should also be informed, because MEIRA may need to tell others to whom it has given the personal information about the inaccuracy.

3.5 **Storage limitation**

MEIRA has data retention policies in place setting out the periods for which personal information should be retained across MEIRA. These policies are available from MEIRA's General Manager.

MEIRA must not keep personal information for longer than is necessary having regard to the purposes for which it is being handled. Personal information will generally be held only for as long as is necessary:

- to fulfil a justified business reason;
- to defend potential legal proceedings brought against MEIRA; or
- to comply with law or any requirement of a governmental or regulatory body.

3.6 **Integrity and confidentiality**

Information security is an important part of MEIRA discharging its obligations under data protection laws. You must comply with all measures taken by MEIRA to protect against unauthorised or unlawful use of and accidental loss, destruction, or damage to personal information handled by MEIRA.

In particular you must comply with all computer use, IT, e-mail, internet, security and any other organisational policies applicable to MEIRA. Up to date copies of these policies can be requested from MEIRA's General Manager.

If you think that there may have been an IT security breach, MEIRA may have a legal obligation to inform the authorities within 72 hours of you becoming aware of it. Therefore, it is of paramount importance that you inform MEIRA's General Manager immediately.

See also section 5 below regarding sharing information with third parties.

4. DATA PROTECTION RIGHTS

You should be aware that every person has rights under data protection laws with respect to the handling of their personal information by MEIRA. In order to assist MEIRA to provide and comply with these rights, you are required to promptly inform MEIRA's General Manager when:

- any request is made by a person for information about, or for a copy of the personal information being handled by MEIRA relating to them (see section 4.1 below for further information on personal information requests);
- any request is made by a person that MEIRA refrain from handling their personal information (ie if they 'object' to their personal information being handled or request that it is 'erased', 'deleted', or 'restricted') or if they ask that their personal information is updated or corrected (see further section 4.2 below on the 'right to be forgotten'); or
- any request is made by a person that MEIRA refrain from sending them marketing material.

4.1 Requests to access personal information

A request to access personal information must be passed immediately to MEIRA's General Manager.

No requests to access personal information should be handled without the involvement of MEIRA's General Manager.

Requests to access personal information must usually be complied with within 30 days, starting from the date of receipt of the request, and it may take some time to gather all of the relevant information. Therefore it is very important that you pass these requests to MEIRA's General Manager as soon as you receive them.

Certain information is exempt from the personal information access regime, and can therefore be excluded from the copy given to the person. For example, information can sometimes be withheld if complying with the request would result in disclosing the identity of third parties, or if the personal information in question concerns references provided confidentially. These exemptions are, in practice, very narrow, and care and legal advice should be taken before relying upon them. Please contact MEIRA's General Manager for further advice and assistance.

4.2 **The right to be forgotten**

Persons have the right to request that their personal information is deleted or removed. This right is not open-ended and will only apply in certain situations, eg where MEIRA is handling the personal information on the basis of consent, and the individual then withdraws their consent. It can broadly be seen as a natural consequence of the principles of data minimisation and storage limitation outlined above.

The precise legal requirements around when data must be deleted are complex. In addition, MEIRA may have to tell anyone it has disclosed the personal information to about the request. Therefore, you should always refer requests for personal information to be erased to MEIRA's General Manager.

5. **SHARING PERSONAL INFORMATION WITH THIRD PARTIES**

Data protection laws impose restrictions on when and how personal information may be given to third parties. In summary:

- personal information should only be given to third parties who have committed to only use it for the purposes set out in MEIRA's notifications;
- personal information should only be given to recipients who are set out in MEIRA's notifications, or to third parties that have signed contracts with MEIRA preventing them from using the personal information other than as instructed by MEIRA; and
- MEIRA must have a legal basis to share the personal information (see section 3.1(b) above).

6. **RECORD KEEPING**

MEIRA is under an obligation to maintain records of the ways in which it handles personal information.

Therefore, whenever the way in which you handle personal information changes, you must let MEIRA's General Manager know.

7. **DATA PROTECTION IMPACT ASSESSMENTS**

Before MEIRA handles personal information in any new way which is likely to present significant risks to the individuals concerned, the law obliges us to carry out a data protection impact assessment. A data protection impact assessment is an exercise carried out by MEIRA's General Manager in order to check that the new way of handling the personal information is lawful, and to determine any changes that are needed in order to mitigate the risks for the individuals concerned.

Examples of when a data protection impact assessment is likely to be required are:

- before MEIRA deploys any new software which automatically scans candidates' CVs and then automatically pre-selects candidates for job vacancies on that basis;
- before handling large volumes of sensitive personal information in a new way; or

- before engaging in any systematic monitoring of candidates' online and social media presence.

This list is illustrative only, although we will add to it as we receive further guidance from data protection regulators. You must always consider whether a new way of handling personal information could present risks to the persons involved. If so, please contact MEIRA's General Manager before proceeding to handle the personal information in the new manner.

8. **MARKETING**

Employees should take careful note of the specific requirements concerning direct marketing, in particular by telephone, e-mail, SMS and similar methods. In some countries, individuals must positively consent (or 'opt in') to being sent marketing. In such countries, no marketing material should be sent to any candidate, client or other person unless you have a clear, up to date record of their relevant consent (for example, if the person has affirmatively ticked a box in a registration form, which explains the particular type of marketing activity).

In other countries, positive consent is not required, but individuals must be given the opportunity to object to (or 'opt out' of) receiving marketing. In these countries, no marketing material should be sent to any candidate, client or other person:

- unless they have been presented with a clear opportunity to opt out of receiving such material each time an e-mail is sent or a telephone call is made; and/or
- if that person has opted out of receiving such material, whether through ticking an opt-out box or by some other means, for example by a separate telephone call or letter.

Employees should remember at all times that in relation to marketing sent electronically (e.g. by e-mail), consent is required and the recipient must be presented with a clear opportunity to opt-out of receiving future marketing in each and every subsequent communication.

If you are in any doubt about the marketing requirements in your country, please contact MEIRA's General Manager.

9. **WHAT HAPPENS IF THERE IS A BREACH OF DATA PROTECTION LAWS?**

Data protection authorities have wide powers to investigate organisations where there is a suspicion of non-compliance with data protection laws. Criminal and civil sanctions are available to the authorities if a breach is substantiated, including significant fines. Investigations by the authorities can often be conducted in the public domain resulting in damage to reputation. Therefore, it is vital that all employees of MEIRA understand the importance of compliance and ensure that they regularly review and comply with this Policy.

MEIRA will regard a failure by you to comply with the contents of this Policy as potential misconduct and may result in disciplinary action, up to and including termination of employment or any other position of engagement with MEIRA. Employees should refer to their contract of employment, the employee handbook and/or other MEIRA policies for details of relevant disciplinary procedures.

10. **CONFIDENTIALITY**

You should be aware that the obligations placed on you as a result of data protection laws and this Policy are in addition to the duty of confidentiality which you owe to MEIRA in respect of all information (including personal information) processed by MEIRA about its employees, clients, candidates, suppliers and any other person.

You must keep all personal information handled by MEIRA completely secret and confidential and must not disclose any such information unless authorised to do so by your manager or Director or unless authorised to do so by this Policy or other security document referred to in this Policy.

11. **TERMINATION OF YOUR EMPLOYMENT WITH MEIRA**

You should be aware that all information, including personal information, processed by you is and will remain the property of MEIRA both during and on termination of your employment with MEIRA. You must promptly return to MEIRA the original and any copies (whether in manual or automated form) of any information obtained by you during your employment.

12. **FURTHER ASSISTANCE**

If you are in doubt as to whether you and/or MEIRA are entitled to process any particular personal information or you have any queries about this Policy in general, you should contact MEIRA's General Manager.

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