

ORA Q DEVELOPMENT LIMITED
PRIVACY POLICY

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1. Introduction

This privacy policy (hereinafter the “**Policy**”) sets out how [ORA Q DEVELOPMENT LIMITED] (“**ORA Q**” or “**Company**”) uses and protects your personal data. The Policy is provided in a layered format so you can click through to the specific areas set out below¹. Alternatively, you can [view the full version of the privacy policy here] **OR** download a copy of the policy here: [www.ora-uae.com/privacy-policy]. The Policy has been developed in accordance with Abu Dhabi Global Market (“**ADGM**”) Data Protection Regulations 2021 (“**DPR**”), for which we note the following key definitions and based on which the Company will be obligated to comply with the DPR in relation to all Personal Data for which it is a Controller, that it is Processing on behalf of another Controller and where it is a joint Controller:

- **Controller:** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data.
- **Data Subject:** means an identified or identifiable living natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **International Organisation:** means an organisation and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries.
- **Personal Data:** means any information relating to a Data Subject.
- **Processing:** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **Processor:** means a natural or legal person, public authority, agency or other body which Processes Personal Data on behalf of the Controller.
- **Services:** means our websites, mobile applications, and other online or digital platforms, as well as any services we provide to Data Subjects.

2. Important information and who we are

This privacy policy gives you information about how ORA Q collects and uses your personal data through your use of this website, including any data you may provide when you [register with us **OR** sign up to our newsletter **OR** purchase a product or service **OR** take part in a competition

This website is not intended for children and we do not knowingly collect data relating to

¹ INP Note to ORA Q: Please confirm viewing format.

children.

Controller

ORA Q DEVELOPMENT LIMITED is the controller and responsible for your personal data (referred to as "ORA Q", "Company", "we", "us" or "our" in this privacy policy).

3. The types of personal data we collect about you²

Personal data means any information about an individual from which that person can be identified.

Depending on the nature of your interactions with us, we collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes [first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender].
- **Contact Data** includes [billing address, delivery address, email address and telephone numbers].
- **[Financial Data** includes [bank account and payment card details].]
- **[Transaction Data** includes [details about payments to and from you and other details of products and services you have purchased from us].]
- **Technical Data** includes [internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website].
- **Profile Data** includes [your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses].
- **Usage Data** includes [information about how you interact with and use our website, products and services].
- **Marketing and Communications Data** includes [your preferences in receiving marketing from us and our third parties and your communication preferences].

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

² INP Note to ORA Q: Please check the below types of information and delete or add as necessary.

4. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us (and/or third parties acting on our behalf) your personal data by filling in online forms or by corresponding with us (and/or third parties acting on our behalf) by phone, email or otherwise. This includes but is not limited to personal data you provide when you:³
 - [inquire for one of our units;
 - create an account on our website;
 - subscribe to our publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.]
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy [www.ora-uae.com/cookie-policy] for further details.
- **Third parties or publicly available sources.** If the Data Subject accesses the Services from an advertisement on a third-party website, application, or other service (a “**Third-Party Service**”) we may automatically receive Personal Information from the owner of the Third-Party Service related to the Data Subject or that advertisement, using cookies, pixels, or other tracking tools.

As described above, we automatically collect certain Personal Data about your usage of our Services using cookies and other tracking tools. We also receive Personal Data directly from you when you voluntarily provide it to us (e.g., when you create an account or submit an enquiry form). We also receive Personal Data from other sources, including through third-party services and organizations. We may combine our first-party data, such as email address or name, with third-party data from other sources and use this to contact Data Subjects (e.g. through direct mail). [For example, if a Data Subject accesses third-party services, such as Facebook, Google, or Twitter, through the Services to login to the Services or to share information about their experience on the Services with others, we shall collect Personal Data from these third-party services.]

5. How we use your personal data

Legal basis

³ INP Note to ORA Q: Please add to this list as appropriate.

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may need to Process your Personal Data to defend or establish a legal claim (for example, claims relating to the provision of our Services). We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter. You have the right to withdraw your consent.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.⁴

Purpose/Use	Type of data	Legal basis [and retention period]
To register your inquiry	(a) Identity (b) Contact	Performance of a contract with you We will need your identity and contact details in order to register your inquiry and be able to reach out to you. We will retain this data until your inquiry is resolved.
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or	(a) Identity (b) Contact (c) Profile (d) Marketing and	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

⁴ INP Note to ORA Q: Please amend, delete or add to this table as appropriate.

<p>privacy policy</p> <p>(b) Dealing with your requests, complaints and queries</p>	<p>Communications</p>	<p>(c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)</p> <p>We will retain this data for as long as necessary in accordance with the DPR.</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>Retention periods are subject to periodic review and may vary depending on the nature of the data and the purposes for which it is processed.</p>
<p>To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>(a) Necessary for our legitimate interests (to study how customers use our Services, to develop them, to grow our business and to inform our marketing strategy). It is also in our interest to promote and advertise our products, including engaging in contextual (non-data driven) and personalised advertising, analytics, and measurement of ad performance, in order to expand our user base by deepening relationships with existing customers and developing new ones. You can opt out of these communications at any time by clicking the 'unsubscribe' link at the bottom of our emails, typing "STOP" for messages and SMS, or updating your communication preferences in your account settings.</p> <p>(b) Consent - Your opt-in consent</p>

		<p>will be required for example, when the law requires consent for email marketing and for certain tracking technologies.</p> <p>We will retain this information until you request us to cease doing so.</p>
To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	<p>(a) Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p> <p>(b) Consent - Your opt-in consent is required for the use of cookies, SDKS, analytics, and third-party technologies data.</p> <p>We will retain this information until you request us to cease doing so.</p>
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	<p>(a) Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business)</p> <p>(b) Consent, having obtained your prior consent to receiving direct marketing communications</p> <p>We will retain this information until you request us to cease doing so.</p>

Direct marketing

During the registration process on our website when your personal data is collected, you will be asked to indicate your preferences for receiving direct marketing communications from ORA Q via [EMAIL, SMS, TELEPHONE, Whatsapp].

We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view on which products and offers may be of interest to you so that we can then send you relevant marketing communications.

Third-party marketing

Last Updated: [17/04/2025]

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

Opting out of marketing

You can ask to stop sending you marketing communications at any time [by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences **OR** by following the opt-out links within any marketing communication sent to you or by contacting us [LINK]].⁵

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes for example relating to updates to our Policy or checking that your contact details are correct.

Cookies

For more information about the cookies we use and how to change your cookie preferences, please see [www.ora-uae.com/cookie-policy].

6. Disclosures of your personal data

We may share your personal data where necessary with the parties set out below for the purposes set out in the table **Purposes for which we will use your personal data** above.

- ORA Group subsidiaries and affiliates.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. International transfers

We share your personal data within the [ORA] Group. This will involve transferring your data outside ADGM to our overseas offices in [Pakistan, Egypt, Cyprus, Grenada, IRAQ].

Whenever we transfer your personal data out of ADGM to areas or countries which have laws that do not provide the same level of data protection as the ADGM law, we always ensure that a similar degree of protection is afforded to it by ensuring that the following safeguards are implemented:

⁵ INP Note to ORA Q: Please advise how will this be carried out from a practical point of view.

[We ensure your personal data is protected by requiring all our group companies to follow the same set of rules when processing your personal data. These rules are called "binding corporate rules" (BCR). To view our BCR, please contact us at [info@ora-uae.com].

[We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside ADGM to countries which have laws that do not provide the same level of data protection as the ADGM law.

Whenever we transfer your personal data out of the ADGM to service providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:

- We will only transfer your personal data to countries that have been deemed by ADGM to provide an adequate level of protection for personal data. OR
- We may use specific standard contractual terms approved for use in ADGM and adopted by the CPD which give the transferred personal data the same protection as it has in the ADGM.

8. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see paragraph 10 below for further

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information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see **OPTING OUT OF MARKETING** in paragraph 5 for details of how to object to receiving direct marketing communications).
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. 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 perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your

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personal data (see the table in section 4 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, [info@ora-uae.com OR 800 672 823]].⁶

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within two months. Occasionally it could take us longer than two months if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated⁷.

11. Contact details

If you have any questions about this privacy policy or about the use of your personal

⁶ INP Note to ORA Q: We assume all matters related to the DP, will be addressed to one email, please confirm.

⁷ INP Note to ORA: If you decide to extend the time period for response to three months, you must tell the data subject this within the first two months, and also explain the reasons for the delay.

data or you want to exercise your privacy rights, please contact us in the following ways:

- Email address: [info@ora-uae.com]
- Postal address: [212164]
- [Telephone number: +97145613600]]

12. Complaints

You have the right to make a complaint at any time to the ADGM Commissioner of Data Protection (“**CDP**”). We would, however, appreciate the chance to deal with your concerns before you approach the CDP so please contact us in the first instance.

13. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on [16/4/2025]. [Historic versions [can be obtained by contacting us at info@ora-uae.com

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

14. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.