

Data Protection Statement:

Rethink¹ respects data privacy and are committed to protecting the individual and personal data collected through its website, offices, events and / or provision of services.

This Data Protection Statement, as amended from time to time (the "Data Protection Statement"), explains the manner in which Rethink collects, uses, maintains and discloses personal data obtained through its website and through the provision of our services.

Rethink adopts ADGM Data Protection Regulations which sets out similar levels of protection of Personal Data and other requirements and general principles as set out under the European General Data Protection Regulations ("GDPR").

Rethink, being a Data Controller, ensures that Personal Data processed by Rethink is:

- Processed fairly, lawfully and securely;
- Processed for specified, explicit and legitimate purposes in accordance with the Data Subject's rights and not further Processed in a way incompatible with those purposes or rights;
- adequate, relevant and not excessive in relation to the purposes for which they are collected or further Processed;
- accurate and, where necessary, kept up to date; and
- kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data were collected or for which they are further Processed.

Rethink has a policy in place in relation to Data Protection and Information Security ("Policy") which establishes the core concepts and principles for the systematic handling, review, storage, safety, retention and management of data processed and documents received and/or created by Rethink in the course of business which accordingly forms its records.

Rethink maintains systems and controls to retain records of matters and dealings in order to fulfil its legal and regulatory obligations with respect to adequacy, access, period of retention and security of records.

Data Subject: The Client, the Client's Employees as may be required per the agreement, the Client's Directors and Beneficial Owners as may be required for Rethink to comply with the AML/CFT legislation, the prospective candidates under recruitment process, the user of Rethink's website, any person contacting Rethink's offices/employees or visiting Rethink's offices or attending webinars or seminars conducted by Rethink or its affiliates.

Method of collection of Personal Data: Provided by the Data Subject (where Personal Data is Processed) or by a Third Party, as applicable, via website enquiry, email or in hard copy, over a phone conversation.

Types of Personal Data (including Sensitive Personal Data) to be Processed: Typically, Rethink may process the following Personal Data as part of provision of services including recruitment, accounting, VAT, compliance and authorization support, processing of visas, etc., marketing of its services, sending information about events or publications, discussing proposed services, etc.:

- name
- place and date of birth
- nationality and citizenship
- passport number, dates of issue and expiry, issuing authority/place
- other IDs numbers, dates of issue and expiry, issuing authority/place
- address, mobile and other phone numbers, email IDs
- religion (if voluntarily mentioned in the CV – this information is not requested by Rethink, except for the purpose of visa processing services)
- bank name and account number (recruitment services, hiring staff for Rethink)
- marital status (recruitment services, hiring staff for Rethink)
- employer, designation and salary (recruitment services, hiring staff for Rethink)

Processing of Personal Data: Rethink may receive Personal Data (including Sensitive Personal Data) via email or in hard copy, over a phone conversation; store this information on Rethink's server including email server; transfer this information within Rethink entities for marketing of its services, sending information about events or publications, discussing proposed services, to banks (when processing payroll payments), to authorities (in compliance with regulations including AML/CFT regulations; or as part of regulatory and compliance services in authorization and other services for financial services providers and DNFBPs and for VAT services), where applicable and relevant to any transfers of data, to third parties (e.g. as part of recruitment services or referral/introduction to other service providers); delete this information after the due record-keeping term of 6 years is completed post termination of the relationship with Rethink; and other legitimate Processing.

Right to Access and Rectify Personal Data: a Data Subject (i.e. a person whose Personal Data is being Processed) has the right to approach Rethink via email to info@rethink-hq.com and request for a copy of the Data Subject's Personal Data Processed by Rethink, review and as necessary, rectify or erase, restrict on processing, object to processing of the Personal Data records as stored by Rethink.

¹ References to **Rethink** includes **Rethink ME Ltd.** registered at Abu Dhabi Global Market Square ("ADGM"), Abu Dhabi, UAE; **Rethink ME Ltd (Dubai Branch)** registered in Dubai; and **Rethink Bahrain**; a subsidiary registered in the Kingdom of Bahrain