

PRIVACY POLICY

This Privacy Policy (the “Policy”) is designed to help you understand how Levant Investment Management Limited, its subsidiaries and affiliate companies (collectively, the “Company”) uses your Personal Data, in accordance with the DIFC Data Protection Law (DIFC Law No. 5 of 2020, including the Regulations and further guidance thereunder¹), the Cayman Islands Data Protection Law, 2017 and, in respect of EU Data Subjects, the EU General Data Protection Regulation, Swiss Federal Data Protection Act and any other provision of the substantive Swiss data protection law, Luxembourg Data Protection Law and other similar privacy legislations (together, the "Data Protection Legislation").

PLEASE READ THIS POLICY CAREFULLY. THIS POLICY MAY BE MODIFIED FROM TIME TO TIME.

We encourage you to read the whole Policy. Alternatively, if you wish to read about specific privacy practices that interest you, please click on the relevant links below.

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¹ <https://www.difc.ae/business/operating/data-protection/>

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PART A – PURPOSE & APPLICABILITY

1. Identity

We Levant Investment Management Limited (“we”, “us”, “our” or “Levant”), a Private Company incorporated and registered in the Dubai International Financial Centre (DIFC), Dubai, United Arab Emirates (UAE).

Registered Office: 1903, Level 19, Emirates Financial Towers, Dubai International Financial Centre (DIFC), Dubai, P.O. Box 215359, UAE

2. Our use of Personal Data

Levant Capital (the “Company” or “you” or “your”) is an investment firm registered in the Dubai International Financial Centre (DIFC) and regulated by the Dubai Financial Services Authority (DFSA) under Prudential Category 3A. The Company specializes in private equity investments in middle market companies with growth opportunities in the MENA region.

In connection with providing our services and in compliance with the applicable laws and regulations in the DIFC and the UAE (“Applicable Law”), we collect and Process² information, including Personal Data.

3. This Privacy Policy

This is our general Privacy Policy that applies across our business operations and website(s).

4. Updating this Privacy Policy

This Policy may be updated from time to time. This version is dated 31st August 2020.

5. What is Personal Data?

Personal Data is any information referring to an identified or Identifiable Natural Person³. This includes information like your name, (e-mail) address and telephone number but can also

² “Processing” of Personal Data can include any one or more of the following, whether or not by automated means: collection, recording, organization, structuring, storage and archiving, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, transfer or otherwise making available, alignment or combination, restricting, erasure or destruction.

³ Identifiable Natural Person means a natural living person 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 (1) or more factors specific to his biological, physical, biometric, physiological, mental, genetic, economic, cultural or social identity (and "Identified Natural Person" is interpreted accordingly).

include less obvious information such as your attendance at a seminar or analysis of your use of our website(s).

Additional protection is afforded under the Data Protection Legislation to Special Categories of Personal Data, i.e. Personal Data revealing or concerning (directly or indirectly) racial or ethnic origin, communal origin, political affiliations or opinions, religious or philosophical beliefs, criminal record, trade-union membership and health or sex life and including genetic data and biometric data where it is used for the purpose of uniquely identifying a natural person.

6. Our responsibility to you

We Process your Personal Data in our capacity as a Controller. This means that we are responsible for ensuring that we comply with the Data Protection Legislation when Processing your Personal Data.

7. Contact Person for Data Protection

For any queries relating to our Data Processing activities or other matters under this Policy or the Data Protection Legislation, you may contact us by:

- sending an email to: compliance@levantcapital.com
- using the contact us tab on our website: www.levantcapital.com

PART B – YOUR PERSONAL DATA

8. Why are we collecting Personal Data about you?

We only collect Personal Data about you in connection with providing our services and conducting our normal business operations. We may hold information about you if:

- you are a client, a representative of a client, or the beneficial owner of a client;
- you are a party or the representative of a party in a matter on which we are advising a client;
- we are required to Process your Personal Data in accordance with Applicable Law, for e.g. anti-money laundering laws;
- your information is provided to us by a client or others, or we otherwise obtain your information, in connection with the service(s) we are providing a client;
- you provide services to us (or you represent a company which provides services to us);
- you represent a regulator, certification body or government body which has dealings with us;
- you attend our seminars, webinars, or events, receive our newsletter updates, or visit our offices or websites;
- you are an applicant for a job with us; and
- you are or were an employee of the Levant.

9. What Personal Data do we collect about you?

The types of information we Process about you may include:

Types of Personal Data	Details
Individual details	Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you
Identification details	Identification numbers issued by government bodies or agencies, such as your passport number, Emirates ID or other national identity number, tax identification number and driving licence number, including copies of such government-issued identification document

Financial information	Bank account details, income, source of wealth, source of funds or other financial information
Anti-money laundering and sanctions data	Screening information received from various anti-money laundering, counter-terrorism financing and sanctions databases relating to you
Special Categories of Personal Data	Information about your political affiliations or opinions or criminal record, to the extent required for compliance with Applicable Law.
Identifiers	Information which can be traced back to you, such as an IP address, a website tracking code or any other information that may be automatically collected through our Website(s) or any other digital communication or network security applications used by us.

As a policy, we do not normally collect any Special Categories of Personal Data, unless such collection is warranted under specific circumstances.

10. Where do we collect your Personal Data from?

We may collect your Personal Data from various sources, including:

- you
- your employer
- our clients and our service providers
- anti-money laundering and counter-terrorism financing databases, sanctions lists, court judgements and other databases
- government agencies and publicly accessible registers or sources of information
- by actively obtaining your Personal Data ourselves, for example using website tracking devices

The sources that apply to you will depend on the purpose for which we are collecting your Personal Data. Where we obtain your information from a third party, in particular your employer or our client, we may ask them to provide you with a copy of this Privacy Policy (or a shortened version of it) to ensure that you know we are Processing your information and the purpose for such Processing.

PART C – OUR USE OF YOUR PERSONAL DATA

11. How do we use your Personal Data?

In this section we set out in more detail:

- the main purposes for which we Process your Personal Data
- the lawful bases upon which we are Processing your Personal Data

Purpose for Processing	Lawful basis for Processing
<p>Anti-Money Laundering and other legal obligations</p> <p>We obtain information about our clients and their representatives and beneficial owners and others to help us comply with legislation on money laundering, terrorist financing, and sanctions.</p> <p>We also collect and disclose Personal Data under applicable legislation and under orders from courts and regulators. Our disclosures will be to those bodies and persons who are entitled to receive the required information.</p> <p>In some cases, this information may include Special Categories of Personal Data, to the extent required by us to ensure compliance with Applicable Law.</p>	<p>For Personal Data – Compliance with Applicable Law that we are subject to.</p> <p>For Special Categories of Personal Data – To comply with Applicable Law that applies to us in relation to anti-money laundering or counter-terrorist financing obligations or the prevention, detection, or prosecution of any crime.</p>
<p>Services</p> <p>We may obtain information about individuals where this is necessary or appropriate to provide services to our clients. We disclose this information to our clients in connection with our role in the relevant engagement.</p>	<p>For Personal Data – Performance of an engagement.</p>
<p>Service providers</p>	<p>For Personal Data – Performance of an engagement.</p>

<p>We collect information about you in connection with your provision of services to us or your position as a representative of a provider of services to us. We do not collect Special Categories of Personal Data for this purpose, other than where we are required to do so to meet our legal obligations (see 'Anti-Money Laundering and other legal obligations' above).</p>	
<p>Seminars, events, legal updates, and other marketing activities</p> <p>If you wish to attend our seminars or events or receive our updates, we ask you to provide us with a limited amount of information (normally your work contact details, your employer's name, your job title, and the legal subjects/events of interest). We use this information to communicate with you about our seminars, events, and updates, to ensure that you are an appropriate audience for them, and to conduct analysis for marketing purposes.</p> <p>We do not collect Special Categories of Personal Data for this purpose.</p>	<p>For all communications with you – Consent from Data Subject.</p>
<p>Visitors to our websites</p> <p>Where you provide us with Personal Data on our Website(s) for the purpose of inquiring about our services, we will only use it for the purpose for communicating with you in connection to your request.</p> <p>Most of our websites use a small number of non-intrusive cookies to help them work more efficiently and to provide us with information on how the website is being used.</p> <p>You can control cookies through the settings or preferences of your browser, as</p>	<p>For Personal Data – Legitimate interests for business development purposes</p>

<p>well as through dedicated browser extensions or add-ons.</p> <p>We do not collect Special Categories of Personal Data on our Website(s).</p>	
<p>Visitors to our offices</p> <p>We have security measures in place at our offices, which include building access controls and may include CCTV. Images captured by CCTV are securely stored and only accessed on a need to know basis (e.g. to investigate an incident).</p> <p>Visitors to our offices may be required to sign in and sign out at building reception in accordance with the building’s security policies. In addition, we may also maintain visitor records ourselves, which are securely stored and only accessible on a need to know basis (e.g. to investigate an incident).</p> <p>We do not collect Special Categories of Personal Data for this purpose.</p>	<p>For Personal Data – Legitimate interests for information security and physical security purposes</p>
<p>Staff Recruitment</p> <p>We ask you to provide Personal Data to us as part of your job application. We will also conduct checks in order to verify your identity and the information in your application as well as to obtain further information about your suitability for a role within the Levant. This may include obtaining information from regulators, anti-money laundering databases, sanctions lists, etc.</p> <p>In some cases, this information will include Special Categories of Personal Data, where such information is required for the purpose of pre-employment verification</p>	<p>For Personal Data – (1) For compliance with Applicable Law that we are subject to; and (2) Legitimate interests to prevent fraud.</p> <p>For Special Categories of Personal Data – For carrying out our obligations and exercising our rights in the context of the Data Subject’s employment.</p>

checks or other employment-related Processing.	
Former Staff We retain Personal Data of former staff members to the extent that we have a statutory obligation to do so.	For all Personal Data - For compliance with Applicable Law that we are subject to

12. Consent

We do not generally Process your Personal Data based on your consent (as we can usually rely on another lawful basis). Where we do Process your Personal Data based on your consent, you have the right to withdraw your consent at any time. To withdraw your consent, please contact us using the contact details mentioned in Section 7 above. To stop receiving our marketing or event-related emails, please click on the ‘Unsubscribe’ link in the relevant email you receive from us.

13. Do we share your information with anyone else?

We do not sell your information nor make it generally available to others. However, we may share your information in the following circumstances:

- We may Process Personal Data of clients, or representatives or beneficial owners of clients, through screening databases or search engines for identity verification or background screening.
- While providing our services, we may require the assistance of various external professional service providers, based in or out of the DIFC. The use of these external service providers may involve the service provider receiving your Personal Data from us, and some transfers of Personal Data may be made to countries or jurisdictions with data protection or privacy laws that are not adequate in comparison with the Data Protection Legislation. Where any such transfers of Personal Data to non-adequate jurisdictions (as defined by the DIFC Commissioner of Data Protection) take place, we take appropriate data security measures to protect Personal Data in accordance with the Data Protection Legislation.
- We use the support services of various external companies to help us run our business efficiently, particularly in relation to our IT systems. Some of these services (such as email hosting and data backups) may involve the service provider Processing your Personal Data. Some transfers of Personal Data may be made to countries or jurisdictions with data protection or privacy laws that are not adequate in comparison with the Data Protection Legislation. Where any such transfers of Personal Data to non-adequate jurisdictions (as defined by the DIFC Commissioner of Data Protection) take place, we take appropriate data security measures to protect Personal Data in accordance with the Data Protection Legislation.

- Where we use external companies to organise or host events for us, we may need to provide these service providers with your Personal Data.
- We may share your Personal Data with other third parties, such as relevant regulators or other authorities, where we are required to do so to comply with legal or regulatory requirements.

In each case where we share your Personal Data with other parties, whether or not in an adequate jurisdiction (as defined by the DIFC Commissioner of Data Protection), we take appropriate data security measures and ensure that the relevant party is contractually required to keep such Personal Data safe, secure and confidential in accordance with the minimum standards under the Data Protection Legislation.

PART D – OTHER IMPORTANT INFORMATION

14. Keeping your Personal Data safe

We implement appropriate steps to help maintain the security of our information systems and processes and prevent the accidental destruction, loss, or unauthorised disclosure of the Personal Data we Process.

15. Profiling and automated decision making

We do not use profiling (where an electronic system uses Personal Data to try and predict something about you) or automated decision making (where an electronic system uses Personal Data to make a decision about you without human intervention).

16. How long do we keep your Personal Data?

We retain your Personal Data in accordance with our data retention policy which categorises all the information held by us and specifies the appropriate retention period for each category of information. Those periods are based on the requirements of the relevant laws and regulations of the DIFC and the Dubai Financial Services Authority (DFSA), and the purpose for which the information is collected and used, taking into account legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice and our business purposes.

17. Cross-border transfers of your Personal Data

Normally, we do not transfer Personal Data outside the DIFC, other than in the specific circumstances indicated in Section 13 above.

Where any such transfers of Personal Data to non-adequate jurisdictions (as defined by the DIFC Commissioner of Data Protection) take place, we take appropriate data security measures and put in place a contract with the relevant third party that includes the standard international data transfer contractual terms approved by the DIFC Commissioner of Data Protection, in accordance with the Data Protection Legislation.

PART E – YOUR RIGHTS

18. Contacting us and your rights

If you have any questions in relation to our use of your Personal Data, please email us using the contact details provided in Section 7 above.

Subject to certain exceptions outlined in the Data Protection Legislation, you have the right to require us to:

- provide you with further details on the nature of your Personal Data held by us and the use we make of your Personal Data, including any sharing or transfer thereof;
- provide you with a copy of the Personal Data we hold about you;
- update any inaccuracies in the Personal Data we hold about you;
- delete any of your Personal Data that we no longer have a lawful basis to use or that you have withdrawn your consent for us to Process;
- where Processing is based only on consent, stop that particular Processing by withdrawing your consent;
- object to any Processing based on our legitimate interests unless our reasons for undertaking that Processing outweigh any prejudice to your data protection rights;
- restrict how we use your Personal Data during such time that the accuracy of the Personal Data, the lawful basis for Processing your Personal Data or our overriding legitimate interest in continuing to Process your Personal Data, is being contested by you; and
- transfer your Personal Data to you or a third party in a structured, commonly used and machine-readable format, to the extent that such Personal Data is automatically Processed and where the lawful basis for such Processing is your consent or for the performance of a contract.

In certain circumstances, we may need to restrict your rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. responding to regulatory requests), or in accordance with other exceptions and limitations specified in the Data Protection Legislation.

19. Your right to complain

If you are not satisfied with our use of your Personal Data or our response to any request by you to exercise your rights, or if you think that we have breached any relevant provision of the Data Protection Legislation, then you have the right to complain to the authority that supervises our Processing of your Personal Data.

Our data protection supervisory authority is the DIFC Commissioner of Data Protection, whose contact details are as follows:

Address: Office of the Commissioner of Data Protection,
Dubai International Financial Centre Authority,
Level 14, The Gate, DIFC,
PO Box 74777, Dubai, UAE

Telephone: +971 4 362 2223

Website: www.difc.ae/business/operating/data-protection/

Email: commissioner@dp.difc.ae