

# PRIVACY POLICY

## Introduction

We are committed to protecting and respecting your privacy. This Privacy Policy (the “**Policy**”) governs the collection and use of personal data by M V S Real Estate Development LLC. It explains how and why we use your personal data and applies to the personal data that you provide us directly, or which we may obtain from other sources.

We may use your personal data for any of the purposes described in this Policy, or as otherwise required for provision of our services to you. For more information about M V S Real Estate Development LLC please see <https://mvsdevelopment.ae/>.

References to "our", "us" or "we" within this Policy are to M V S Real Estate Development LLC, Office 1908, Opal Tower, 42, Burj Khalifa street, Business Bay, P.O. Box 333614, Dubai, UAE, email: [info@mvsdevelopment.ae](mailto:info@mvsdevelopment.ae), tel.: +971 04 834 7248.

## Who We Are

M V S Real Estate Development LLC is the data controller of your personal data. We decide how and why your personal data is processed, either alone or jointly with others.

If you use our facilities and services, the entity which manages the relevant facility or service will also be a data controller in respect of your personal information.

If you have any questions about this Policy, the use of your data, or would like to be directed to our Data Protection Officer, please contact [info@mvsdevelopment.ae](mailto:info@mvsdevelopment.ae).

## Information covered by this Privacy Policy

In this Policy we refer to “processing” your “personal data”.

Processing is taken to mean anything that is done to or with personal data (including simply collecting, storing, or deleting that data).

Personal data is any information relating to an identified or identifiable living person. When “you” or “your” are used in this statement, we are referring to the relevant individual who is the subject of the personal data.

## What we collect from you and how we use it

We process different categories of personal data to enable us to provide services to you, as further described below:

**Contact Details:** Includes, but is not limited to, home address, home / personal mobile number and personal email address, emergency contact number.

**Identification data:** Includes but is not limited to name, your photo, citizenship, nationality, passport data, Visa information, drivers' licence information, the resident country's ID, marriage certificate, birth certificate and education certificates, national/social insurance number (if applicable), health insurance, government retirement plan information and tax reference/ID (if applicable).

**Special categories of data:** Includes data that reveals the following about a data subjects: racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, and data concerning health.

**Web Data:** Includes, but is not limited to, cookies, user activity logs, and website visitor interaction data.

**Financial Data:** Includes, but is not limited to, card details and bank details.

**Other Personal Information:** Includes but is not limited to date and place of birth, emergency contact details (if applicable), gender and marital status.

The reason these categories of personal data are processed, along with our lawful basis for doing so, are set out in the table below:

**Personal Data Directly Obtained from You**

Description of Processing	Purpose for Processing	Category of Personal Data	Lawful Basis
<b>Real Estate Operations</b>			
We process your personal data for marketing purposes (e.g. personalising offers and for lead generation activities), as well as for analytics purposes.	Marketing and Analytics services	Identification Data, Contact Details, Web Data, Other Personal Information	As appropriate we will process your personal data in reliance upon consent provided, or for our legitimate interest.
We process your personal data to manage operations related to real estate development.	Operations	Identification Data, Contact Details	We rely upon legitimate interest to process your personal data.
We process your personal data to manage land sales and related operations.	Operations	Identification Data, Contact Details	We rely upon legitimate interest to process your personal data.
<b>Working with Brokers</b>			
We process your personal data for real estate sales activities including	Supporting Service	Identification Data, Contact	We process personal data in line with our contractual obligations.

operations and managing the brokerage network.		Details, Financial Data	Where applicable, we may also rely upon your consent to do so.
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**Internal Business Operations**

We process your personal data for procurement purposes, such as vendor management and contract management.	Supporting Service	Identification Data, Contact Details, Financial Data	We process personal data in line with our contractual obligations.
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We process your personal data for invoicing purposes.	Account Management	Identification Data, Contact Details, Financial Data	We process your personal data in line with our contractual obligations. We may also rely upon legal obligation where we are required to do so.
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For management and audit of our business operations including accounting.	Financial Management	Identification Data, Contact Details, Financial Data	We rely upon legitimate interest to process your personal data. We may also rely upon legal obligation where we are required to do so.
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We process your personal data in order to comply with legal requirements and exercise or defend legal claims.	Litigation & Disputes	Identification Data, Contact Details, Financial Data, Other Personal Information	We rely upon legitimate interest to process your personal data. We may also rely upon legal obligation where we are required to do so.
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We process your personal data for security purposes, and to ensure secure backup and archival of IT Systems.	Security Purposes	Identification Data, Contact Details, Financial Data, Web Data, Other Personal Information	We rely upon legitimate interest to process your personal data.
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We process your personal data for application management and support	Security Purposes	Identification Data, Contact Details, Financial Data, Web Data,	We rely upon legitimate interest to process your personal data.
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purposes, and to respond to customer requests.

Other Personal Information

Process personal data in relation to the usage of Wi-Fi services provided at our locations.

Security Purposes

Contact Details, Web Data

We rely upon legitimate interest to process your personal data.

We process your personal data to facilitate application integration within our systems.

Security Purposes

Identification Data, Contact Details, Financial Data, Web Data, Other Personal Information

We rely upon legitimate interest to process your personal data.

### **Personal Data Indirectly Obtained from Others**

We also receive some information about you from third parties. These are further detailed below:

**Brokerages:** We obtain your personal data from brokers we engage to identify potential customers and who progress the transaction with you.

### **Legitimate Interest**

Where we rely upon legitimate interest as a lawful basis, we have balanced your rights and freedoms against our interests, or those of any third parties, and determined your rights are not infringed. Legitimate Interest is where your personal data is processed for either our own interests or the interests of third parties. This can include commercial interests, individual interests or broader societal benefits.

### **How long do we keep your personal Data?**

Your personal data will not be kept longer than necessary to meet the purposes detailed above. The criteria that we use to determine how long we will keep your personal data includes the period of time during which we have an ongoing relationship with you, and whether we have a legal obligation to store it (for example, for accounting purposes or for litigation, or regulatory investigations purposes).

Should retention of your personal data no longer be required we will remove it from our systems and records and/or take steps to properly anonymise it so that you can no longer be identified from it.

### **Who do we share your personal data with?**

Where necessary to fulfil the purposes described in this Policy, we shall disclose your personal data to certain third-parties, vendors and service providers or affiliated employees, contractors and entities as described below.

Where we share personal data, we do so with the following parties for the following purposes:

<b>Category of Third-Party</b>	<b>Purpose for Disclosure</b>
Legal and Professional Advisers	Audits, Invoicing, Legal Requirements, Transaction processing
Finance, Insurance and Credit Providers	Invoicing
Government Bodies, Regulators	Audits, Customer Queries, Invoicing, Legal Requirements, Improving our Service, Progress the Transaction
IT, Digital, Technology and Telecoms	Audits, Customer Queries, Application Security and Support, Improving our Service

### **Profiling**

Where we have a lawful basis to do so, we will use your personal data to evaluate certain personal aspects about you, such as to analyse or predict aspects concerning your economic situation, personal preferences, interests, reliability, behaviour, location or movements. This is known as “Profiling”. We only conduct profiling where it will not have a legal or other significant effect on you. We undertake profiling to help tailor our marketing to you.

### **Where we Store/Transfer your Personal Data**

When processing your personal data, we may transfer this to third parties based in other countries, to the extent necessary to fulfil the purposes described in this Policy. Such transfers shall always be done in compliance with relevant data protection laws.

For transfers of personal data from the UK and European Economic Area (“EEA”) we transfer personal data to entities outside the EEA, under the EU Standard Data Protection Clauses.

To the extent required, we will also transfer your personal data to third parties in connection with a reorganization, restructuring, merger, acquisition or transfer of assets, provided that the receiving party agrees to treat your personal data in a manner consistent with applicable laws and requirements.

### **Security of Personal Data**

M V S Real Estate Development LLC has implemented technology and operational security measures in order to protect personal data from loss, misuse, alteration or destruction. Only authorised persons are provided access to personal data, such individuals have agreed to maintain the confidentiality of this personal data.

### **Your Rights**

You have certain rights relating to your personal data. However, these rights can differ depending upon the country in which you are located. That country's law will determine which rights apply and in what instances.

### ***Right to withdraw consent***

Where you have provided your consent to us, you will always have the right to withdraw this at any time. You can do this by either following the information provided at the time you provided your consent, or by contacting us using the following email address: [info@mvsdevelopmentio.ae](mailto:info@mvsdevelopmentio.ae). The withdrawal of consent will not affect any processing that was based on consent before its withdrawal.

### ***Right to request correction of your personal data***

You will always have the right to request that we correct any personal data that we process about you that is inaccurate or incomplete. You can do this by contacting us at [info@mvsdevelopmentio.ae](mailto:info@mvsdevelopmentio.ae).

### ***European Data Protection Rights***

Where the General Data Protection Regulation applies, you are also provided with additional rights. This allows you, subject to certain conditions, to:

- upon request, be provided access to, or copies of, your personal data that we process;
- upon request, restrict the processing of your personal data;
- upon request, delete your personal data which we process;
- object to our processing of your personal data; or
- upon request, obtain a copy of your personal data which we process in a commonly used and machine-readable format.

It is important to understand that these rights are not absolute (e.g. their application may depend upon the lawful basis we rely upon to process your personal data) and that we may require further information from you (e.g. to confirm your identity) in order to action your request. If the General Data Protection Regulation applies, you also have the right to lodge a complaint with the supervisory authority in your country of residence, place of work or the country in which an alleged infringement of data protection law has occurred within the EU.

### **Contacting us**

If you want to exercise any of the rights set out above or have any questions or concerns about how we treat your personal data, please contact us [info@mvsdevelopmentio.ae](mailto:info@mvsdevelopmentio.ae) or by writing to us at: M V S Real Estate Development LLC, Office 1908, Opal Tower, 42, Burj Khalifa street, Business Bay, P.O. Box 333614, Dubai, UAE. Please include your reply address when you write to us.

### **Changes to this Privacy Policy**

We keep this Policy under regular review. We reserve the right, at our discretion, to change, modify, add or remove sections of this Policy at any time. You are also encouraged to review this Policy from time to time for updates.