

AL OMANIYA FINANCIAL SERVICES SAOG PRIVACY POLICY

1 Introduction

Welcome to the AL OMANIYA FINANCIAL SERVICES ("**AOFS**") privacy policy. AOFS respects your privacy and is committed to protecting your personal data. This privacy policy has been prepared in compliance with the Oman Sultani Decree No.6/2022 Promulgating the Personal Data Protection Law ("**DP Laws**") and will inform you as to how we look after your personal data when you use our website or mobile application (referred to as the "**Application**") and will also tell you about your privacy rights and how the law protects you.

By accepting our Application's terms of use, accessing the Application and/or using our services, you consent to the terms of this privacy policy and agree to be bound by it as it may be amended or updated from time to time.

2 Purpose of this privacy policy

This privacy policy aims to give you information on how AOFS collects and processes your personal data, including any data you may provide through the Application when you sign up to our services.

Al Omaniya Financial Services SAOG whose registered office is at P.O. Box 1087, P.C. 114, Jibroo, Muscat, Sultanate of Oman (referred to as "**AOFS**", "**we**", "**us**" or "**our**" in this privacy policy) is the controller under the DP Laws and is responsible for your personal data.

It is important that you read this privacy policy together with any other policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and policies and is not intended to override them.

3 The data we collect about you

Personal data means any information about an individual from which that person can be identified and includes things like a person's name, identification number, online identifier data (such as an IP address) or location data etc. It does not include data where the person's identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data:** includes first name, maiden name, last name, username or similar identifier, civil ID, 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, bank statement, salary certificate and payment card details.
- **Transaction Data:** includes details about payments to and from you and other details of services you have used 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, and other technology on the devices you use to access our Application.
- **Profile Data:** includes your Application username and password, services used by you, your interests, preferences, feedback and survey responses.
- **AML & Background Data:** includes anti-money laundering data, and data regarding politically exposed people or politically influential people.
- **Usage Data:** includes information about how you use our Application and services.
- **Marketing and Communications Data:** includes your preferences in receiving marketing materials and correspondence from us and our third parties, together with your communication preferences.

We may also collect, use and share aggregated data such as statistical or demographic data in certain circumstances. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Application feature. Aggregated data could be derived from your personal data but may not always be deemed to be personal data in and of itself. However, if we combine or connect aggregated data with your personal data such that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not generally collect any personal data related to genetic data, biological data, health data, ethnic origins, sexual life, political or religious opinions or beliefs, criminal convictions or security measures. However an exception is made for health data in certain limited circumstances, namely in the form of a health report, which shall only be required for loans above OMR 50,000, or if a report is required by our insurance company.

The Application is not intended for children and we do not knowingly collect data relating to children except for the number of dependents related to the prospective applicant.

4 **How is your personal data collected?**

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



- **Direct interactions:** you may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us via the Application, by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - create an account on our Application;
 - subscribe to our services or publications;
 - request marketing materials to be sent to you;
 - enter a competition, promotion or survey;
 - give us feedback or contact us; or
 - apply for loans with a limit of above OMR 50,000. Please note applicants are required to submit a health declaration for life insurance coverage as per the Central Bank of Oman's Regulations.
- **Automated technologies or interactions:** as you interact with our Application, 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. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Third parties or publicly available sources:** we will receive personal data about you from various third parties and public sources as set out below:
 - Mala'a Oman Credit Bureau Report; and
 - LexisNexis Applicant Screening System to collect information including but not limited to PEP Designations-related data, the UN consolidated List, and OFAC- Office Foreign Asset Control List for screening applicants.

5 **Purposes for which we will use your personal data**

Most commonly, we will use your personal data on the basis that you have expressly consented to this.

Please note however that in certain circumstances and solely where this is required or otherwise permitted by law, we may process your personal data without your knowledge or consent. For instance, specific consent is not required in relation to the performance of a contract between us and you, the personal data owner.

We have set out below a description of all the ways we plan to use your personal data.

- To register you as a new customer;



- To process and deliver our products and services;
- To manage our relationship with you which will include;
 - Notifying you about changes to our terms or privacy policy;
 - Asking you to leave a review or take a survey;
- To enable you to participate in a prize draw, competition or complete a survey;
- To administer and protect our business and our Application (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- To deliver relevant content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you;
- To use data analytics to improve our website, services, marketing, customer relationships and experiences;
- To make suggestions and recommendations to you about services that may be of interest to you.

6 **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We will get your express opt-in consent before we use your personal data or otherwise share your personal data with any third party for marketing or advertising communications and other purposes.

7 **Disclosures of your personal data**

In relation to section 5 (*Purposes for which we will use your personal data*) we may share your personal data with certain third parties, including as set out below:

- Service providers based in the Sultanate of Oman who provide IT and system administration services; and
- Professional advisers including lawyers, bankers, auditors and insurers based in the Sultanate of Oman who provide consultancy, banking, legal, insurance and accounting services.
- Regulators and other authorities based in the Sultanate of Oman who require reporting of processing activities in certain circumstances.
- 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.

8 **International transfers**

For any of our external third parties that are based outside the Sultanate of Oman, their processing of your personal data will involve a transfer of data outside the Sultanate of Oman. Whenever we transfer your personal data out of the Sultanate of Oman, we ensure a similar degree of protection is afforded to it by ensuring certain safeguards are implemented. For instance, we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data (if applicable) or which otherwise have special legislation in place on the protection of personal data.

9 **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 the Ministry of Transport, Communications and Information Technology (or other applicable regulator) of a breach where we are legally required to do so.

10 **Third-party links**

Our Application 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 Application, we encourage you to read the privacy policy of every website you visit.

11 **How long will you use my personal data for?**

We will generally 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 certain circumstances, for instance 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 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.

12 Your legal rights

Under the DP Laws, you have the following rights in relation to your personal data:

- **Right to be informed** about what personal data we hold and how it is processed, details of which are set out in this privacy policy.
- **Right to request access** to your personal data. This enables you to receive a copy of the personal data we hold about you.
- **Right to 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 amended, updated or blocked, though we may need to verify the accuracy of the new data you provide to us.
- **Right to request erasure of your personal data** unless processing is necessary for the purpose of documentation and preservation or national storage.
- **Right to be notified of any hacking or other data breach**, and of the actions we have taken in this regard.
- **Right to request the transfer** of your personal data to another controller.
- **Right to withdraw consent** at any time where we are relying on consent to process your personal 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.

If you wish to exercise any of the rights set out above, please contact us.

We have designated a personal data protection officer who is responsible for overseeing enquiries in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the personal data protection officer using the details set out below.



Contact details:

Full name: Said Alghaithy, Deputy Manager IT

Email address: said.alghaithy@aofs.co.om

Postal address: AI Omaniya Financial Services SAOG whose registered office is at P.O. Box 1087, P.C. 114, Jibroo, Muscat, Sultanate of Oman

Telephone number: 24724734

You have the right to make a complaint at any time to the Ministry of Transport, Communications and Information Technology. We would, however, appreciate the opportunity to deal with your concerns before you approach the Ministry of Transport, Communications and Information Technology so please contact us in the first instance

13 **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.

14 **Changes to this privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. We reserve the right to update this privacy policy at any time, which will be posted on our Application. Please check back frequently to see any updates or changes to this privacy policy. We may also notify you in other ways from time to time about our processing of personal information.

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.