



DAMAC Digital

Privacy Policy

DD-COMP-PRO-MS-000XX

Version 0.2

Dated: 22nd September 2025

Document Classification – Internal

This document is classified as Internal by DAMAC Digital. It is intended solely for employees and authorized stakeholders of DAMAC Digital. Unauthorized distribution or disclosure outside the organization is strictly prohibited.



Table of Contents:

1. Stakeholder List	Error! Bookmark not defined.
2. Document Change	Error! Bookmark not defined.
3. Abbreviations, Acronyms and Definitions	Error! Bookmark not defined.
4. Privacy Polciy	5
5. Collection of personal informatio	6
6. Marketing communication	8
7. Use, sharing and retention of personal information	8
8. How to contact DAMAC DIGITAL and modify your information or preferences	11
9. Modifications to this privacy notice	11
10. Questions, concerns or complaints	11
11. Documentation Authorization	12

Controlled Distribution List

Once updated, a copy of the latest revision will be published in the document management system in use. An e-mail to this effect will be sent to the relevant personnel or heads of department.

Copy No	Owner	Location
Master	Director Compliance & Audit	Master File
Published	Document Controller	Share Point Server Directory

Stakeholder List

Business Function	Name	Category of Stakeholder
		A, C, D, E, F
		B, C, D, E
		C, D, E
		C, D, E
		D, E

NOTE: Categories of level of responsibility:

- A. Policy owner (with general management responsibility)
- B. Deputy policy owner
- C. Must be consulted
- D. Must be notified
- E. Must approve (sign-off)
- F. Document author

Document Change

Ver No	Date Changed	Changed by	Change Description
V0.1	16 th September 2025	Rohan Dighe	Initial draft
V0.2	22 nd September 2025	Sona George	Document updated in the DAMAC Digital template

Abbreviations, Acronyms and Definitions

Document No	Description	Location
DD-COMP-GLO-MS-000XX	Glossary (GLO)	Share Point Server Directory

Privacy Policy

Our commitment to protecting your personal data

This DAMAC DIGITAL privacy notice ('Privacy Notice'), describes how DAMAC DIGITAL ('we' or 'us') collects, uses, shares, and retains personal information that you provide to us, or that we collect, when you use the DAMAC DIGITAL website and other websites owned or controlled by DAMAC DIGITAL (the 'sites') or related mobile applications, complete related forms, participate in DAMAC DIGITAL events, or communicate with one of our customer service representatives ('personal data'). DAMAC DIGITAL privacy policy aligns with all. DAMAC DIGITAL privacy notice refers to the applicable to data protection laws under which this policy operates.

Please note that if you disagree with anything in this privacy notice, you must not use the sites or mobile applications or provide personal information to us in connection with DAMAC DIGITAL's products or services.

Commented [RD1]: Is this relevant?

Commented [DW2]: Include a reference to the applicable data protection laws under which this policy operates.

Commented [SG3R2]: Amended



1. Collection of personal information

a. Information you directly and voluntarily provide to us

Enquiry: If you provide your personal data to DAMAC DIGITAL to enquire about our products or services, or if you sign up to become a registered user of any website operated by DAMAC DIGITAL, you will be required to provide certain information as part of the registration process. This information for which the data is collected for specific purposes (e.g., to respond to enquiries, register user accounts, or provide access to services) may include your first and last name, email address, telephone number and business address.

Membership information is used to communicate with you, to design content and activities that we believe would be of interest to you, and to ensure that DAMAC DIGITAL will not violate any applicable sanctions in providing you access to DAMAC DIGITAL's products or services. If you wish to opt-out of receiving these communications from us, please follow the instructions contained in an applicable communication you receive from us.

Events: DAMAC DIGITAL may host events for product knowledge sharing. If you register for a DAMAC DIGITAL event, we will access the information in your account to provide you with information and services associated with the event. If you register for one of our events and you are not a DAMAC DIGITAL member, under the lawful basis for collecting and using personal data in this context (e.g., consent for event participation or legitimate interests in providing event-related services), we will collect your first and last name, email address, and business address, information about the type of business you work for or with, which we will use to provide you with information and services associated with the event.

Communications with DAMAC DIGITAL: If you communicate or correspond with us by email, through postal mail, via phone or through other forms of communication, including our customer service centre, we will collect the information you provide as part of those communications, under the applicable data protection laws (e.g., legitimate interest, performance of a contract, or consent) for processing information received via communication channels to ensure legal compliances. For example, if you correspond with us through email, we will collect and store the email address you use to send the applicable correspondence and use it to respond to your enquiry; to notify you of DAMAC DIGITAL events, or other services; or to keep a record of your complaint, accommodation request, and similar purposes. By choosing to subscribe to email communications, you hereby consent to receive communication from DAMAC DIGITAL Group. We will use your provided email address to send you relevant updates, promotions, and other marketing materials. You have the option to unsubscribe from these communications at any time by following the 'unsubscribe' link included in our emails or by contacting us directly.

b. Information we automatically collect from you

We may automatically collect information about you when you use the sites or our services, on the lawful basis under data protection law. For example, if you access the sites through a computer, we will automatically collect information such as your browser type and version, computer and connection information, IP address, pages you have visited and standard web log information. We may use remarketing tools that will serve ads to you based on your location, the content you have explored on our

Commented [DW4]: Suggest stating the specific purposes for which the data is collected (e.g., to respond to enquiries, register user accounts, or provide access to services).

Commented [SG5R4]: Amended

Commented [DW6]: Recommend clarifying the lawful basis for collecting and using personal data in this context (e.g., consent for event participation or legitimate interests in providing event-related services).

Commented [SG7R6]: Amended

Commented [DW8]: Clarify the legal basis under applicable data protection laws (e.g., legitimate interest, performance of a contract, or consent) for processing information received via communication channels.

Commented [SG9R8]: Amended

Commented [DW10]: Again, recommend specifying the lawful basis under data protection law.

Commented [SG11R10]: Amended



site to render ads to you after you have left our site. If you access the sites through a mobile device, we may also be able to identify the location of your mobile device. You may choose not to share your location details with us by adjusting your mobile device's location services settings. For instructions on changing the relevant settings, please contact your service provider or device manufacturer.

We may automatically collect information from you when you use the sites using 'cookies' and other similar technologies, such as web beacons. Cookies are small amounts of data that are stored within your computer's internet browser and that are accessed and recorded by the websites that you visit so that they can recognise the same browser navigating online at a later time. The cookies are not able to execute code or access other information stored on the computer. Web beacons are transparent pixel images that are used in collecting information about website usage, email response and tracking.

In addition to those mentioned above, third parties may also set cookies when you visit the site. In some cases, that is because we have hired a third party to provide services on our behalf, such as an enquiry form. Because your browser connects to those third parties, they are able to set or read their own cookies on your device and may collect information about your online activities (but not any personally identifiable data) across websites or online services.

Some of our pages use a third-party software provider, such as [Optimizely](#), [Unbounce](#), [Hotjar](#) etc. to test variations in the content to help us improve your experience. You can view their respective Privacy Policies (and / or opt-out) using these links:

Commented [RD12]: Is this relevant to EDGNEX website?

- https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0
- <https://policies.google.com/privacy?hl=en-US>
- <https://instapage.com/privacy-policy>
- <https://clarity.microsoft.com/terms>
- <https://www.moengage.com/privacy-policy/>

Commented [RD13]: Is this relevant to EDGNEX website?

Information that may be collected by cookies when you use the sites may include, without limitation:

- the pages you visit within the sites
- the date and time of your visit to the sites
- the amount of time you spend using the sites
- the Internet Protocol (IP) address used to connect your computer to the internet
- your computer and connection information such as your browser type and version, operating system and platform
- data collected through cookies is aggregated or anonymised,
- the duration of data would be retained, and whether data is shared with third-party analytics providers

Commented [DW14]: Recommend disclosing whether data collected through cookies is aggregated or anonymised, how long it is retained, and whether it is shared with third-party analytics providers.

This information is collected to enhance the site performance and end user experience. You can set your browser to reject cookies or to notify you when you are sent a cookie. To learn more about your ability to manage cookies and web beacons, please consult the privacy features in your browser. Click here to view our Cookie Policy.

Commented [SG15R14]: Added



c. Information you provide to payment processors

All payments made to DAMAC DIGITAL are processed by third party processing service engaged by DAMAC DIGITAL. All information collected by these third-party providers for purposes of processing your payments is not available to us, unless you have otherwise provided this information to us in connection with your use of the sites or our products and services.

Disclaimer: DAMAC DIGITAL is not responsible for the data protection practices of such third-party processors, unless otherwise provided for under applicable law.

2. Marketing communications

We may combine your information with data we collect from our vendors and use it to improve and personalise the DAMAC DIGITAL website. Users are required to provide explicit consent (opt-in) before receiving marketing communications. If you don't wish to receive marketing communications from us or participate in our ad-customisation programs, simply update your communication preferences at marketing@damacgroup.com. This is in alignment with the unsubscribe mechanism with standard practice, including a direct unsubscribe link in each communication, rather than relying solely on an email address, or follow the directions provided with the communication or advertisement.

3. Use, sharing and retention of personal information

a. How we use your information

In general, we use the information we collect primarily to provide, maintain, protect, improve our current products, to develop new ones, and for better alignment with data minimisation principles. This allows us to:

- Facilitate the creation of and security of your account on our network
- Identify you as a user in our services
- Improve our services, website and how we operate our business
- Understand and enhance your experience using our website, products and related services
- Respond to your comments or questions (and for our support team to provide service)
- Send you related information, including confirmations, invoices, technical notices, updates, security alerts and support and administrative messages
- Communicate with you about promotions, upcoming events and news regarding products and services offered by DAMAC DIGITAL
- Link or combine it with other information we get from third parties, to help us understand your needs and provide you with better service
- Protect, investigate and deter against fraudulent, unauthorised or illegal activity

Commented [DW16]: Suggest expanding this section to include a disclaimer that EDGNEX is not responsible for the data protection practices of such third-party processors, unless otherwise provided for under applicable law.

Commented [SG17R16]: Added

Commented [DW18]: Recommend clarifying whether users are required to provide explicit consent (opt-in) before receiving marketing communications.

Commented [SG19R18]: Added

Commented [RD20]: Is there a email address for EDGNEX?

Commented [DW21]: Recommend aligning the unsubscribe mechanism with standard practice by including a direct unsubscribe link in each communication, rather than relying solely on an email address.

Commented [SG22R21]: Amended

Commented [DW23]: Suggest separating operational uses from marketing uses for clarity and better alignment with data minimisation principles.

Commented [SG24R23]: Amended



b. Information for individuals located in the European Union

Legal basis for the processing of personal information from EEA residents

If you reside within the European Economic Area (EEA), our processing of your personal information will be legitimised as follows:

- Whenever we require your consent for the processing of your personal information such processing will be justified pursuant to Article 6(1) lit (a) of the General Data Protection Regulation (EU) 2016/679 ('GDPR'). This article in the GDPR describes when processing can be done lawfully.
- If the processing of your personal data is necessary for the performance of a contract between you and DAMAC DIGITAL or for taking any pre-contractual steps upon your request, such processing will be based on GDPR Article 6(1) lit (b). If this data is not processed, DAMAC DIGITAL will not be able to execute the contract with you.
- Where the processing is necessary for us to comply with a legal obligation, we will process your information on basis of GDPR Article 6(1) lit (c), for example complying in the fields of employment law.
- And where the processing is necessary for the purposes of DAMAC DIGITAL's legitimate interests, such processing will be made in accordance with GDPR Article 6(1) lit (f), for example to detect fraud.
- You may also receive personalised advertising where you indicate to DAMAC DIGITAL specific interests by requesting information about a product or service or by indicating your marketing preferences in the Preference Centre (access to which is provided at the bottom of this page), however, you may also receive general communications regarding new DAMAC DIGITAL locations, products and services. Users may withdraw consent at any time as per the unsubscribe mechanism process.

Commented [DW25]: Recommend making clear that data subjects may withdraw consent at any time, and clarify the process for doing so.

Commented [SG26R25]: Amended

Transferring personal data from the EU to the UAE

DAMAC has its headquarters in the United Arab Emirates (UAE). Information we collect from you will be processed in the United Arab Emirates. The security of your privacy and the information you give us is very important to us, but we cannot ensure or warrant the security of any information you transmit to DAMAC or guarantee that your information on the DAMAC Service may not be accessed, disclosed, altered or destroyed by breach of any of our industry standard physical, technical or managerial safeguards. When you enter sensitive information (such as log in credentials) on our order form or chat form, we encrypt that information using secure socket layer technology (SSL). Please be aware that no data transmission over the Internet can be guaranteed to be 100% secure. As a result, DAMAC cannot guarantee or warrant the security of any information you transmit on or through the sites and you do so at your own risk.

Commented [RD27]: To be discussed

Edgnex link with Damac Properties - TBD

DAMAC DIGITAL participates in its compliance with the EU Privacy Shield Framework. DAMAC DIGITAL is committed to subjecting all personal information received from EU member countries to the Frameworks' applicable principles ('Principles').



European Union data subject rights

The European Union's General Data Protection Regulation and other countries' privacy laws provide certain rights for data subjects (these are persons that can be identified).

This Privacy Notice is intended to provide you with information about what personal data DAMAC DIGITAL collects about you and how it is used.

If you wish to confirm that DAMAC DIGITAL is processing your personal data, or to have access to the personal data DAMAC DIGITAL may have about you, or have other questions, please contact us at legal@damacgroup.com.

You may also request information through our [Data Subject Access Portal](#) about:

- the purpose of the processing
- the categories of personal data concerned
- who else outside DAMAC DIGITAL might have received the data from DAMAC DIGITAL
- what the source of the information was (if you did not provide it directly to DAMAC DIGITAL)
- where the personal data is stored and how long it will be stored.

You have a right to correct (rectify) the record of your personal data maintained by DAMAC DIGITAL if it is inaccurate. You may request that DAMAC DIGITAL erase that data or cease processing it, subject to certain exceptions. You may also ask DAMAC DIGITAL for your personal data to be supplemented or updated, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. You may withdraw your consent for the processing of personal data or the further processing of personal data by DAMAC DIGITAL at any time. You may also request that DAMAC DIGITAL cease using your data for Direct Marketing purposes by emailing legal@damacgroup.com.

In many countries (including EEA countries), you have a right to lodge a complaint with the appropriate data protection authority if you have concerns about how DAMAC DIGITAL processes your personal data. When technically feasible, DAMAC DIGITAL will – at your request – provide your personal data to you or transmit it directly to another controller. You have the right to receive your personal information in a structured and standard format.

In addition to the information contained in this Privacy Notice, you may be provided with additional and contextual information concerning particular services or the collection and processing of your personal data upon request.

c. Data storage and retention

Your personal data is stored by DAMAC DIGITAL on its servers, and on the servers of the database management services DAMAC DIGITAL engages, located in the United Arab Emirates. DAMAC DIGITAL retains data for the duration of the customer's business relationship with DAMAC DIGITAL and otherwise as required under applicable data retention law. Personal data will be kept for no longer than is necessary for the purposes for which your personal data are processed. We will retain your personal data as long as you are a DAMAC DIGITAL customer or require our services so that we can provide these services to you.

Commented [RD28]: Is there a email address for EDGNEX legal?

Commented [RD29]: Do we have this?

Commented [RD30]: Is this to be done via 'Data Subject Access Portal' or via email to legal?

Commented [RD31]: Located in ?

Commented [DW32]: Recommend specifying the exact retention periods (or categories of data and their respective retention periods).

Commented [SG33R32]: Amended



If you are located in the European Economic Area, at the moment you come out of DAMAC association or withdraw your consent for the processing of your personal information, unless we are required to retain this personal data by law or to comply with our regulatory obligations, all your personal data received and stored will be erased if no longer needed by us. In such a case, we will only keep this personal data for as long as necessary. For more information on where and how long your personal data is stored, and for more information on your rights of erasure and portability, please contact our data privacy resource at legal@damacgroup.com.

Commented [DW34]: Consider clarifying the specific criteria or examples of what constitutes data that is "no longer needed", and under what lawful grounds retention may continue.

Commented [SG35R34]: Amended

Commented [RD36]: Is there a email address for EDGNEX legal?

4. How to Contact DAMAC DIGITAL and modify your information or preferences

Privacy notice shall be updated and all DAMAC DIGITAL employees shall be instructed to include this privacy notice to their email. Questions regarding this Privacy Notice should be directed to DAMAC DIGITAL's data privacy resource: legal@damacgroup.com. If you would like to modify the types of marketing email messages you receive from DAMAC DIGITAL, you may do so by following the instructions within the body of any email message that you receive from us.

Commented [RD37]: Privacy notice to be updated and all EDGNEX employees must be instructed to include this privacy notice to their email

Commented [SG38R37]: Amended

5. Modifications to this Privacy Notice

From time to time, DAMAC DIGITAL may need to update or modify this Privacy Notice, to reflect changes in our business practices, data collection practices or organisation. We reserve the right to amend this Privacy Notice at any time, for any reason, without notice to you, other than the posting of the amended Privacy Notice on the sites, or, if you have provided your email address to us, sending you an email notifying you of the amended Privacy Notice. It is strongly recommended to check the site often, referring to the date of the last modification listed at the top. We will in any case not reduce your rights under this Privacy Notice without your explicit and informed consent. If you do not agree to the changes, you should discontinue your use of the sites, and cease providing personal information to us, prior to the time the modified Privacy Notice takes effect. If you continue using the sites or provide personal information after the modified Privacy Notice takes effect, you will be bound by the modified Privacy Notice. Continued use of services implies acceptance, not automatic "binding".

Commented [DW39]: Recommend softening this language and confirming that continued use of services implies acceptance, not automatic "binding".

Commented [SG40R39]: Amended

6. Questions, concerns or complaints

If you have any questions or concerns about this Privacy Notice, please contact legal@damacgroup.com.

Commented [RD41]: Email address for Edgnex Privacy

12. Document Authorization

Approved By (Sign)	
Name	
Capacity	
Date Approved	

Approved By (Sign)	
Name	
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Date Approved	

Approved By (Sign)	
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Date Approved	

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