

MAGNIFI MANAGEMENT & GENERAL TRADING DMCC License Number: DMCC-858859
Unit 1608, HDS Business Centre, Al Thanyah Fifth (JLT), Plot No. 990-0, Property No. 393-982, Makani 12216
73357, Dubai, United Arab Emirates

Cookies Policy

Effective Date: August 1, 2025 Last Updated: August 1, 2025

This Cookies Policy explains how Magnifi Management & General Trading DMCC("Magnifi", "we", "us", or "our") uses cookies and similar technologies on our website, in accordance with UAE law. We process data in a fair, transparent, and lawful manner. In line with the <u>UAE Federal Personal Data Protection Law (PDPL)</u> and DMCC guidelines, we inform you what cookies are, what cookies we use, and how you can control them. This policy is part of our commitment to privacy and data protection.

What Are Cookies and How We Use Them

A cookie is a small text file placed on your device when you visit our site. Cookies and similar tracking technologies (such as web beacons) help websites remember your preferences, improve performance, and analyze usage. We use cookies and other local storage to make your online experience more efficient and personalized. For example, cookies may store your language preference, login status, or items in your shopping cart. Cookies themselves do not usually contain personal information; however, they may record information such as your IP address or device type to help us understand how visitors use our site. This information, when aggregated or combined with other data you provide, allows us to analyze traffic and improve our services. We comply with DMCC's practice that "in most cases, we will need your consent in order to use cookies. The exception is where the cookie is essential in order for us to provide you with a service you have requested".

Categories of Cookies			_
We group cookies into three main categories:	N		ı

- 1) Essential Cookies these cookies are strictly necessary for the basic functioning of the website (for example, security, session management, and core features you request). Essential cookies enable you to navigate our site and use key features; without them, the website would not work properly. Under the PDPL, processing of personal data is prohibited without consent except in certain cases. One such case is when processing is "necessary to perform a contract to which the Data Subject is a party". Essential cookies fall under this exception, because they are needed to deliver the service you requested. We therefore rely on Article 4(9) of the PDPL to place essential cookies without requiring separate prior consent;
- Performance/Analytics Cookies these cookies collect information about how visitors use our site (such as page views, time on site, click-through rates, and visitor origin). We use tools like Google Analytics, Matomo, or equivalent to track aggregate usage data. Performance cookies help us understand trends and improve the website (for instance, identifying which pages are most popular or whether users encounter errors). These cookies may capture device and browser information (like browser type, operating system, or screen resolution), but they do not directly identify you. Because performance cookies are not strictly necessary for the service, they are considered personal data processing under UAE law. The PDPL requires "explicit consent" for any processing that is not covered by an exception. We therefore treat performance cookies as non-essential and obtain your clear consent before using them. In short, we will only enable analytics cookies if you have actively accepted them;
- **Marketing Cookies** these cookies are used for advertising and tracking purposes. They may remember that you have visited our site and may be linked to your browsing habits on other sites. Marketing cookies are



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often placed by third parties (e.g. Meta Pixel, Google Ads, LinkedIn Insight Tag) to show you targeted ads or measure ad campaign effectiveness. We will not set marketing cookies unless you have chosen to allow marketing/tracking cookies in our consent banner.

Cookie Consent and Control

When you first visit our website, you will see a cookie banner or notice that explains cookie categories and asks for your preference. You can Accept and Close or Manage Consent. Choosing Accept and Close means you consent to all categories (including performance and marketing cookies). If you choose Manage Consent, you can granularly enable or disable specific categories of cookies according to your preference, but that means that only essential cookies will be used until you choose your preferred cookies.

Under the PDPL, consent should be freely given, specific, informed, and unambiguous. Our banner and preference controls are designed to meet these criteria. You have the right to withdraw your consent at any time (PDPL Article 6). If you withdraw consent for non-essential cookies, we will promptly disable those cookies. Withdrawing consent does not affect the lawfulness of any cookie processing carried out before withdrawal.

Managing Your Preferences

You may change or withdraw your cookie preferences at any time, without affecting the validity of processing that already occurred. To do this, use the Manage Consent button on our cookies banner or adjust your browser preferences. Most browsers allow you to control cookie settings (for example, blocking or deleting cookies). If you disable all non-essential cookies, our site will still function, but certain features (like personalized content or analytics) may not work fully. For detailed steps, you can visit resources like https://www.aboutcookies.org/ or https://allaboutcookies.org/.

Your choices are specific to this website. Other sites have their own cookie notices and settings, so you may need to adjust cookies separately for each site you visit.

Third-Party Cookies and International Transfers

Our website uses some third-party cookies. These cookies are set by external domains and collect information about your activity on this site. Importantly, data collected by these third parties may be transferred outside the United Arab Emirates.

We comply with PDPL Articles 22–23 governing cross-border data transfers. Under Article 22, personal data may only be transferred to a country or territory that provides an "adequate" level of protection. Under Article 23, transfers to locations without adequacy may be permitted if we implement appropriate safeguards (such as data transfer agreements or binding contractual clauses that meet UAE standards) or obtain your explicit consent. In all cases, we ensure that any third party we engage provides at least the protections required by UAE law. If you consent to marketing cookies, you are explicitly consenting to these transfers. You can revoke this consent at any time by withdrawing the marketing cookie permission.

Data Security and Retention

We take data security seriously. As the PDPL requires, we have implemented appropriate technical and organizational measures to protect personal data (including data obtained from cookies) against unauthorized



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access, alteration, disclosure, or destruction. We use encryption, firewalls, and regular security testing to safeguard our systems. Only authorized personnel may access cookie-related data, and we keep detailed records of data processing activities.

Cookie data is retained no longer than necessary for its purpose. PDPL Article 5(6)–(7) mandates that personal data be kept securely and "not kept after the purpose of its processing has been exhausted". Session cookies expire when you close your browser. Persistent cookies have defined lifetimes as specified in our inventory. We delete or anonymize cookie-related data when it is no longer needed. Any personal data derived from cookies (such as unique user identifiers) is erased or irreversibly anonymized once analysis is complete or retention periods end.

If a data breach affects personal data (including any personal data collected via cookies), we will notify the <u>UAE Telecommunications and Digital Government Regulatory Authority</u> and any affected individuals as required by PDPL Article 9. You will be informed promptly of any breaches that impact the confidentiality of your personal data.

Contact and Exercising Your Rights

For questions or to exercise your privacy rights, please contact us at the contact details as indicated on the website (please include "Privacy Request" in the subject) or at our address: Unit 1608, HDS Business Centre, Al Thanyah Fifth (JLT), Plot No. 990-0, Property No. 393-982, Makani 12216 73357, Dubai, United Arab Emirates (Attn: Legal & Privacy).

Please provide sufficient information to identify yourself and the data or service at issue. We aim to respond to all requests promptly (within the PDPL's one-month timeframe). If you remain unsatisfied, you may escalate a complaint to the UAE Telecommunications and Digital Government Regulatory Authority. This policy will be reviewed and updated as needed to remain compliant with UAE law. We will post any material changes on our website and update the effective date above.