

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

Privacy Policy

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

Magnifi Management & General Trading DMCC ("Magnifi", "we", "us", or "our") is committed to protecting the personal data of our customers, website visitors, and partners in accordance with <u>UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data</u> (PDPL).

In this policy, "Personal Data" means any information relating to an identifiable person – for example names, contact details, company affiliation, or location. We collect, use, share, and safeguard Personal Data as described below, and we rely on your explicit consent or other legal bases under the PDPL for processing.

Personal Data We Collect

When you use our website (by clicking Request a Price or Contact Us), we may collect Personal Data such as:

- 1) Your name, email address, telephone numbers, company name, job title, and business address (or other address you provide);
- 2) Your country or geographic location (provided automatically via Cookies or in forms);
- 3) Any information you choose to provide in free-text fields or communications (e.g. details of your request, comments).

We collect this data directly from you (when you submit forms or contact us) and may also collect information automatically (e.g., IP address via cookies). We do not collect special categories of sensitive data as part of our standard services.

How We Use Personal Data

We use your Personal Data for the following purposes, based on your consent or other lawful bases (based on the contractual necessity):

- 1) To process your Request a Price or Contact submissions, provide quotes, answer questions, and communicate with you;
- 2) To administer our services, manage accounts, and perform supply and logistics arrangements (e.g. scheduling deliveries with logistics partners);
- 3) To register and manage business partners who sign up via our partner page (e.g. verifying company details).
- 4) With your consent, to send newsletters or updates about our products/services. (You can withdraw consent anytime see Your Rights below.)
- 5) To analyse usage of our website (e.g. through cookies/Google Analytics) so we can improve content and functionality.
- 6) To comply with UAE laws and regulations (e.g. trade, tax, or safety laws) and to defend legal rights.



disclosed to you.

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Whenever we process your data, we do so transparently and only for purposes

Cookies and Tracking Technologies

We use cookies and similar tracking tools on our website to improve functionality and gather analytics. A cookie is a small file stored on your device when you visit a site. Cookies help us remember your preferences, analyze site traffic, and personalize your experience. Types of cookies we use: essential cookies (needed for basic site functions), performance/analytics cookies (to understand usage), and optionally marketing cookies (for promotional content) (as described in our Cookies Policy).

We will obtain your informed consent before using any non-essential cookies. If you decline cookies, our site will still work, but some features (like the interactive supply map) may be limited. You can control or delete cookies through your browser settings (see https://allaboutcookies.org/). Note that blocking cookies may affect site functionality.

All cookies that collect Personal Data (e.g. analytics tied to user identity) are only set with your permission, in line with the PDPL's requirement that data processing be based on consent (absent another lawful basis).

Cross-Border Data Transfers

Our data is primarily stored in the UAE (on secure local servers), but we may process or transfer Personal Data outside the UAE for certain services (e.g. using cloud servers or global analytics tools). Under the PDPL, cross-border transfers are only allowed under strict conditions, thus we confirm that:

- 1) We will transfer data only to countries or jurisdictions that have strong data protection laws comparable to the UAE's PDPL;
- 2) If transferring to countries without adequate laws, we ensure appropriate protections for instance, binding agreements or security measures that mirror PDPL standards;
- 3) If no adequacy or safeguards exist, by using our website and submitting information, you consent to the transfer and processing of your data outside the UAE on these terms. Transfers will not proceed if they would conflict with UAE public or security interests.

Sharing with Third Parties

We do not sell or rent your Personal Data to third parties. However, we share information as needed to deliver our services and comply with law, with appropriate safeguards:

- 1) We share Personal Data with trusted third-party service providers (including logistics providers, carriers, shipping companies, cloud hosts, IT vendors, and analytics providers) who perform services on our behalf. These parties may be located inside or outside the UAE. All service providers are contractually required to use your data only for the agreed purpose and to keep it secure;
- 2) In the event we would be involved in a merger, acquisition, or sale of assets, customer data may be transferred to the new owner or affiliates, subject to confidentiality and legal safeguards;
- 3) We may disclose Personal Data to government authorities, regulators, courts, or law enforcement when required by law or to protect rights and safety. For instance, we will cooperate with legal orders or investigations, which may involve sharing relevant customer data;



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4) We may share personal data with auditors, accountants, lawyers, or advisors as needed for professional services (e.g. auditing, legal advice).

Before sharing data with any new category of third party, we will notify you and, where required by law, obtain your consent.

Data Security and Retention

We follow robust security practices to protect your Personal Data:

- 1) We use encryption, firewalls, and other industry-standard security technologies to safeguard data during transmission and storage. Our servers are housed in secure, access-controlled facilities;
- 2) Access to Personal Data is restricted to authorized personnel who need it for legitimate business purposes. We train our staff on privacy and conduct regular security reviews;
- 3) We retain Personal Data only as long as necessary for the purposes collected (e.g. fulfilling contracts, maintaining accounts, or as required by law). When data is no longer needed, we securely delete or anonymize it

Your Rights under UAE Law

Under the PDPL, you have several rights regarding your Personal Data. These rights are subject to certain conditions (e.g. we can refuse if it conflicts with legal obligations). In accordance with the PDPL, you have a right to:

- 1) Request a copy of the Personal Data we hold about you, and information on how it is processed;
- 2) Ask us to correct or update any incorrect or incomplete personal data about you (free of charge);
- 3) Request deletion of your Personal Data when it is no longer needed for the purpose collected, or if you withdraw consent and we have no other legal basis to keep it;
- 4) Ask us to stop processing your data in certain situations (if you contest its accuracy or object to unlawful processing).
- 5) Object to our processing of your data on grounds related to your particular situation (e.g. direct marketing). After an objection, we will stop processing unless we have compelling legal grounds or it is necessary for legal claims;
- 6) Request a machine-readable copy of the Personal Data you provided to us, and have it transmitted to another controller (where technically feasible);
- 7) If we rely on your consent, you can withdraw it at any time. Withdrawal does not affect any processing already lawfully done, but we will stop further processing based on that consent.
- 8) File a complaint with the <u>UAE Telecommunications and Digital Government Regulatory Authority</u> if you believe your data rights have been violated.

To exercise any of these rights, please contact us as described below. We will respond to your request in accordance with PDPL timelines and may ask for information to verify your identity. Nothing in this policy limits your legal rights under the PDPL.

Breach Notification



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In the unlikely event of a Personal Data breach that risks your privacy or data confidentiality, we will act promptly:

- 1) We will notify the <u>UAE Telecommunications and Digital Government Regulatory Authority</u> without undue delay, providing details of the breach and mitigation steps as required by law;
- 2) If the breach is likely to adversely affect your privacy, we will also inform you as soon as possible about what happened, what data was involved, and measures we have taken to address it.

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 <u>UAE Telecommunications and Digital Government Regulatory Authority</u>.

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.

