

## Data Protection information for the Data Subjects

### Statement:

**Rethink ME Ltd** ("Rethink" of "the Firm") maintains systems and controls to retain records of matters and dealings, including accounting records and corporate governance practices in order to fulfil its legal and regulatory obligations with respect to adequacy, access, period of retention and security of records and thereby adopts ADGM Data Protection Regulations which sets out similar levels of protection of Personal Data and other requirements and general principles as set out under the European General Data Protection Regulations ("GDPR").

**Rethink ME Ltd** ("Rethink"), being a Data Controller, ensures that Personal Data processed by Rethink is:

- Processed fairly, lawfully and securely;
- Processed for specified, explicit and legitimate purposes in accordance with the Data Subject's rights and not further Processed in a way incompatible with those purposes or rights;
- adequate, relevant and not excessive in relation to the purposes for which they are collected or further Processed;
- accurate and, where necessary, kept up to date; and
- kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data were collected or for which they are further Processed.

Rethink has in place a Data Protection, Record management, and Information Security Policy ("Policy") which establishes the core concepts and principles for the systematic handling, review, storage, safety, retention and management of data processed and documents received and/or created by Rethink in the course of business which accordingly forms its records. Records are maintained at the Firm's registered offices and are capable of being reproduced, in English, within 3 business days. Accounting records and all other records are maintained for 6 years from the relevant date.

### Relevant references:

#### Data Controllers:

**Rethink ME Ltd** registered at Abu Dhabi Global Market Square ("ADGM"), Abu Dhabi, UAE with registration number 000001367 with registered address at Office 3414, Al Maqam Tower, ADGM, Al Maryah Island, Abu Dhabi, UAE;

**Rethink ME Ltd (Dubai Branch)** registered in Dubai, UAE with registration number 713129 with registered address at Office 8 (floor 8), Al Gurg Tower 3, Baniyas Road, Rigga Al Buteen, Dubai, UAE;

**Rethink Bahrain**; a subsidiary registered in the Kingdom of Bahrain with registered address at Office 202, 2nd floor, Ola Tower, 743, Sanabis Area, Manama, Bahrain

**The above entities collectively are referred to as Rethink.**

**Data Subject:** The Client, the Client's Employees as may be required per the Agreement, the Client's Directors and Beneficial Owners as may be required for Rethink to comply with the AML/CFT legislation.

**Method of collection of Personal Data:** Provided by the Data Subject (where Personal Data is Processed) or by a Third Party, as applicable.

**Types of Personal Data to be Processed:** Typically; Rethink may process the following Personal Data:

- name
- place and date of birth
- nationality and citizenship
- passport number, dates of issue and expiry, issuing authority/place
- other IDs numbers, dates of issue and expiry, issuing authority/place
- address, mobile and other phone numbers, email IDs
- religion (if voluntarily mentioned in the CV – this information is not requested by Rethink)
- bank name and account number (recruitment services, hiring staff for Rethink)
- marital status (recruitment services, hiring staff for Rethink)
- employer, designation and salary (recruitment services, hiring staff for Rethink)

**Processing of Personal Data:** Rethink may receive Personal Data (including Sensitive Personal Data) via email or in hard copy, over a phone conversation; store this information on Rethink's server including email server; transfer this information within Rethink entities, to banks (when processing payroll payments), to authorities (in compliance with regulations including AML/CFT regulations; or as part of R&C services in authorization and other services for financial services providers and DNFBPs and for VAT services (where applicable and relevant to any transfers of data, to third parties (e.g. as part of recruitment services); delete this information after the due record-keeping term of 6 years is completed post termination of the relationship with Rethink; and other legitimate Processing.

**Right to Access and Rectify Personal Data:** a Data Subject (i.e. a person whose Personal Data is being Processed) has the right to approach Rethink via email to [info@rethink-hq.com](mailto:info@rethink-hq.com) and request for a copy of the Data Subject's Personal Data Processed by Rethink, review and as necessary, rectify the Personal Data records as stored by Rethink.