



## Privacy Notice

We, DAMANA (“DAMANA” “we”, “us”, “our”), appreciate your interest in our services. Protecting your privacy is a top priority for us. This privacy notice explains how and what type of personal data will be collected and use, process, transfer or store (“Use”), why it is collected and Used and to whom will be shared.

Please read this notice carefully.

By accessing DAMANA Websites you accept this “Privacy Notice”. If you do not agree to this Privacy Notice, do not proceed to further web pages of DAMANA Websites. This Privacy Notice may be updated from time to time. We therefore ask you to review our Privacy Notice on regular basis. The last line of this Privacy Notice below indicates when the Privacy Notice was updated.

### Who is DAMANA?

DAMANA is Saudi Arabian Insurance Company B.S.C. (c) and any affiliate, subsidiaries or any entity controlling, controlled by or under common control with DAMANA.

### What is the purpose and the scope of this Statement?

DAMANA is committed to safeguarding the personal data that we have received from users. Accordingly, DAMANA has developed this statement to describe how and what type of data will be collected and /or Used from users and the purposes for which DAMANA may Use such data. This Privacy Notice applies to the personal data collected and Used by DAMANA. DAMANA also outlines reasonable precautions which are taken to keep your data secure.

### What personal data will be collected?

When you visit DAMANA Websites, our web server automatically records details about your visit (for example, your IP address, the type of browser software used, DAMANA Website pages that you actually visit including the date and the duration of your visit).

In addition, we will collect and Use various types of the personal data including but not limited to Full name, Gender, Contact details (address, e-mail address, phone/fax number), Age / date of birth, Nationality, Marital status, Occupation, Language, Physical and Psychological health conditions, medical reports , death certificates, medical claims history, details of physical and psychological health or medical conditions, credit/debit card and bank account details.

We will Use your personal data provided to us for a number of purposes including but not limited to the below.

DAMANA will Use your personal data:

- For the purposes of technical administration and research & development of the DAMANA Website,
- For customer and user administration and marketing,
- To inform you about our services and products, and
- For such purposes as otherwise specified.
- For Insurance Claims Management.
- Fraud, Money Laundering and Terrorist Financing prevention and detection,
- Meet any legal obligations (e.g., tax, accounting and administrative obligations).

We will Use your personal data with your express consent unless applicable laws and regulations do not require us to obtain your express consent.

We are the sole owners of the personal data collected on this website. We only Use the information that you voluntarily give us via email or any other channels of communication.

We will not sell, rent or share this personal data with any third party other than as necessary to fulfill the Purpose.

We will retain your personal data for a minimum period of Ten (10) years or any longer term required by the applicable Local Laws.

### **DAMANA Holding W.L.L.**

#### **Manama - Kingdom of Bahrain**

Office 71, LMC Building 852, Road 3618  
Block 436, Al Seef District  
P.O. Box 60139

T: (+973) 17 562500 | F: (+973) 17 581040

For the purposes indicated above, we may receive your personal data from you directly or from any third party including but not limited to employer, policy sponsor, brokers, business partners, insurers, medical providers, fraud prevention agencies, investigators, Regulators search information providers, intermediaries or delegated authorities.

Who is the data controller?

A data controller is a natural, legal person public authority, agency or other body which, alone or jointly with others who controls and determines the purposes (the “why”) and essential elements of the means (the “how”) of the Processing of personal data.

Who is the data Processor?

A Data Processor is a natural or legal person which Processes personal data on behalf of a Data Controller.

How will we obtain and use your personal data?

We receive your personal data from you directly or from any third party including but not limited to employer, policy sponsor, brokers, business partners, insurers, medical providers, fraud prevention agencies, investigators, Regulators search information providers, intermediaries or delegated authorities.

We will use your personal data with your express consent unless applicable laws and regulations do not require us to obtain your express consent.

We will use your personal data for a number of purposes including but not limited to:

- a. For Insurance Claims Management
- b. For technical administration and research & development
- c. For customer and user administration and marketing,
- d. To inform you about our services and products, and
- e. Fraud, Money Laundering and Terrorist Financing prevention and detection,
- f. Meet any legal obligations (e.g., tax, accounting and administrative obligations).

For the purposes indicated above we will Use your personal data based on our legitimate interests and/or to comply with our legal obligations.

These legitimate interests and/or legal obligations include the following reasons for the processing of your personal data without your express consent:

1. For the performance of the purpose if the processing is necessary to perform the contract or if you request the processing in order to enter into any contract.
2. For the protection of your vital interests or the Compliance with a legal obligation to which you are subject.

Who will have access to your personal data?

We will ensure that your personal data is processed in a manner that is compatible with the purposes indicated above. For the stated purposes, your personal data may be disclosed to the following parties who operate as third party data controllers:

- Regulators, Healthcare Providers.

For the stated purposes, your personal data may be disclosed to the following parties who operate as data processors under our instruction:

- Sub-contractors.

Finally, we may share your personal data to meet any legal obligation, including to the relevant ombudsman if you make a complaint about the product or service we have provided to you.

Where will my personal data be processed?

Your personal data may be processed inside DAMANA by the parties specified above, subject always to contractual restrictions regarding confidentiality and security in line with applicable local data protection laws and regulations. We will not disclose your personal data to third parties who are not authorized to process them.

What are your rights in respect of your personal data?

Where permitted by applicable law or regulation, you have the right to:

- Access your personal data held about you and to learn the origin of the data, the purposes and ends of the processing, the details of the data controller(s), the data processor(s) and the parties to whom the data may be disclosed,
- Withdraw your consent at any time where your personal data is processed with your consent,



- Have us update or correct your personal data so that it is always accurate,
- Have us delete your personal data from our records if it is no longer needed for the purposes indicated above but only after the retention period (10 years or any longer term required by the applicable Law),
- Request that your personal data will be restricted from processing in certain circumstances, for example where you have contested the accuracy of your personal data, for the period enabling us to verify its accuracy,
- Obtain your personal data in an electronic format,
- Express any concern you have about the use of your personal data.

You may exercise these rights by adjusting your privacy preference settings where you have created an online account with us or contacting us as detailed in section 9 below providing your name, email address, account identification, and purposes of your request.

How long do we keep your personal data?

We will retain your personal data for Ten (10) years from the receipt of your data or for any longer term required by the applicable Laws. We will not retain your personal data for longer than necessary and we will hold it only for the purposes for which it was obtained.

How can you contact us?

In case of inquiries and grievances related to your personal data, you can contact us as follows:

**DAMANA Holding W.L.L.**  
**Manama - Kingdom of Bahrain**  
**Office 71, LMC Building 852, Road 3618**  
**Block 436, Al Seef District**  
**P.O. Box 60139**  
**T: (+973) 17 562500 | F: (+973) 17 581040**

How often do we update this privacy notice?

We regularly review this privacy notice. We will ensure the most recent version is always available. This privacy notice was last updated on Sep 2019.

What security measures have we implemented to protect your information collected through the DAMANA Website? DAMANA has implemented reasonable technical and organizational security measures to protect your personal data collected by DAMANA via the DAMANA Website against unauthorized access, misuse, loss or destruction.

How do we treat electronic messages sent to and from DAMANA?

All electronic messages sent to and from DAMANA are protected by reasonable technical and organizational measures and may only be accessed in justified cases in line with applicable laws and regulations (e.g. court order, suspicion of criminal conduct, violation of regulatory obligations,) to specific persons in defined functions (e.g. Legal, Compliance, Risk). Every step of the process, as well as the search criteria used, are logged in an audit trail. All emails are disposed of after the applicable retention period has expired.

What should you consider when sending data over the Internet?

The Internet is generally not regarded as a secure environment, and information sent via the Internet (such as to or from the DAMANA Website or via electronic message) may be accessed by unauthorized third parties, potentially leading to disclosures, changes in content or technical failures. Even if both sender and receiver are located in the same country, information sent via the Internet may be transmitted across international borders and be forwarded to a country with a lower data protection level than exists in your country of residence.

Please note that we accept no responsibility or liability for the security of your information whilst in transit over the Internet to DAMANA. In order to protect your privacy, we would like to remind you that you may choose another means of communication with DAMANA, where you deem it appropriate.

Google Analytics

The DAMANA Website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the



site. The information generated by the cookie about your use of the website will be transmitted to and stored by Google on servers in the United States.

In case IP-anonymization is activated on this website, your IP address will be truncated within the area of Member States of the European Union or other parties to the Agreement on the European Economic Area. Only in exceptional cases the whole IP address will be first transferred to a Google server in the USA and truncated there. The IP-anonymization is active on this website. Google will use this information on behalf of the operator of this website for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing them other services relating to website activity and internet usage. The IP-address, which your Browser conveys within the scope of Google Analytics, will not be associated with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

You can also opt-out from being tracked by Google Analytics with effect for the future by downloading and installing Google Analytics Opt-out Browser Add-on for your current web browser: [click here](https://tools.google.com/dlpage/gaoptout?hl=en-GB)  
[tools.google.com/dlpage/gaoptout?hl=en-GB](https://tools.google.com/dlpage/gaoptout?hl=en-GB)

#### LINKS TO THIRD PARTY SITES

The DAMANA Site may contain links to other Third Party Web Sites (hereinafter referred to as “Linked Sites”). The Linked Sites are not under the control of DAMANA and DAMANA shall not be held responsible in any way whatsoever for the contents of any Linked Site or for any damage or loss resulting from the use of such Linked Sites, including without limitation any link contained in a Linked Site, or any changes or updates to a Linked Site. Additionally, DAMANA shall not be held responsible in any way whatsoever for any third party content, web casting or any other form of transmission received from any Linked Site. DAMANA shall provide these links to the User only as a convenience, and the inclusion of any link does not imply any endorsement by DAMANA of the site or any association with its operators. DAMANA will not be held liable for any loss or damage incurred by the User’s access to any such content or other services supplied by a third party or for the failure to give notice to the User of the possible content or subject matter of any transaction received from any Linked Site.

#### NO UNLAWFUL OR PROHIBITED USE

As a condition of use of the DAMANA Sites, the User pledges to DAMANA that they shall not under any circumstances whatsoever use the DAMANA Site for any purpose that is unlawful or prohibited by these terms, conditions, and notices. The User shall not use the DAMANA Site in any manner or form which could cause any form of damage or loss to DAMANA or damage, disable, overburden, or impair the DAMANA Sites or interfere with any other party’s use and enjoyment of the DAMANA Site. The User shall not obtain or attempt to obtain any materials or information through any means not intentionally made available or provided for through the DAMANA Site. DAMANA reserves the right to remove any content displayed which is in breach of this Policy or any other applicable guidelines provided on access to User content services and/or the barring of users who submit such content. The User is solely liable for all activities whilst using DAMANA as a service provider and will thus be solely responsible for the consequences of any unlawful or prohibited activity.

#### USE OF COMMUNICATION SERVICES

The DAMANA Sites may contain bulletin board services, chat areas, news groups, forums, communities, personal web pages, calendars, and/or other message or communication facilities designed to enable the User to communicate with the public at large or with a group “Communication Services”. The User hereby agrees to use the Communication Services only to post, send and receive messages and material that are legal, proper and related to the particular Communication Service. By way of example, and not as a limitation, the User agrees that when using a Communication Service, they shall not under any circumstances whatsoever:

- Defame, abuse, harass, stalk, threaten, inconvenience, cause annoyance or needless anxiety to any person, impersonate any other person or act in a way which may reasonably be considered to be objectionable, or otherwise violate the legal rights (such as rights of privacy and publicity) of others.
- Publish, post, upload, download, distribute or disseminate any inappropriate, profane, defamatory, infringing, obscene, indecent or unlawful topic, name, material or information.
- Upload files that contain software or other material protected by intellectual property laws (or by rights of privacy or publicity) unless the User owns or controls the rights thereto or has received all necessary consents.
- Upload files that contain software viruses, corrupted files, or any other similar software or programs that may damage the operation of another’s computer.

- Upload files that contain material that is illegal, offensive, abusive, malicious, threatening, racist, indecent, defamatory, derogatory, obscene, menacing, or otherwise objectionable.
- Advertise or offer to sell or buy any goods or services for any business purpose, unless such Communication Service specifically allows such messages.
- Conduct or forward surveys, contests, pyramid schemes, chain letters, mass mailings, political campaigning, commercial solicitation or any Spam.
- Download any file posted by another User of a Communication Service that the User is aware of, or should reasonably be aware of that cannot be legally distributed in such manner.
- Falsify or delete any author attributions, legal or other proper notices or proprietary designations or labels of the origin or source of software or other material contained in a file that is uploaded.
- Restrict or inhibit any other User from using and enjoying the Communication Services.
- Violate any code of conduct or other guidelines, which may be applicable for any particular Communication Service.
- Harvest or otherwise collect information about other Users, including e-mail addresses, without the consent of the other User.
- Violate any applicable laws or regulations.
- Do anything that is contrary to Bahrain public policy or ethics.
- Attempt to tamper with, modify copy, disassemble, reverse engineer, decompile or breach the system security in any way whatsoever, or seek to gain access to the system or User accounts that are stored within the "Company Name Site" system.