



PRIVACY POLICY

**KARM Legal Consultants PVT Limited
("KARM", the "Company")**

Latest Revision number: 1.0

Thank you for visiting our website (and/or facilities, referred to herein below). Your privacy and Personal Data, together with its protection is of paramount importance to us.

IMPORTANT INFORMATION

This Privacy Policy, as amended or otherwise changed from time to time, sets out how KARM Legal Consultants Pvt Limited (including all subsidiary and affiliated entities; hereinafter referred to as “**KARM**”, “**we**”, “**us**” or “**our**” as the context requires) collects, processes, uses, maintains, stores, transfers, discloses, erases or destroys confidential and personally identifiable user data, obtained from and through our services offerings (referred to as “**Business**”).

We are committed to safeguarding the privacy of the personal data that we process in the course of our business, including the Personal Data we receive from you (“**you**” or “**your**”). As such, we feel it is necessary to disclose to you what data our Business collects and further, what we do with the data that we collect or receive, and with whom do we share such data and for what purposes.

This Privacy Policy should be read and interpreted together with our [Terms and Conditions](#) .

This Privacy Policy has been prepared with reference to the ADGM Data Protection Regulations (“**ADGM**”).

For the purposes of the applicable data protection law, KARM is typically the “data controller” of any Personal Data provided to us. Specifically, your data will be controlled by KARM. Very occasionally, we will act on specific retainers as a “processor” (meaning that we process personal data only in accordance with the directions of a data controller, or as otherwise permitted by law).

Please read the following information carefully to understand our views and practices regarding how we handle Personal Data. If you have any queries about our approach to data protection that are not already addressed in this Privacy Policy, please contact karmadmin@karmadv.com as per the contact details set out at the end of this Privacy Policy.

CHANGES TO THIS PRIVACY POLICY

From time to time, KARM may revise, amend or supplement this Privacy Policy to reflect necessary changes in law, our Personal Data collection and usage practices or the features of our Business. If any material changes are made to this Privacy Policy, the changes will be prominently posted on our website. KARM, however, requires and specifically places on you the onus of occasionally familiarizing yourself with the contents of this Privacy Policy, for your own information; and particularly to do so every time you access our Facilities or make use of our services.

Changes to this Privacy Policy are effective when they are published.

Users’ data collected and processed is done so in accordance with the relevant principles, including: lawfulness, fairness and transparency; purpose limitation; data minimisation; accuracy; storage limitation; integrity and confidentiality (security) and accountability.

CONSENT FOR LAWFULNESS OF PROCESSING

You consent to your Personal Data being processed to satisfy all legal obligations arising from any contracts entered into with / involving you or to deliver any services to you; or to take steps at your request prior to entering into a contract with you.

INFORMATION WHICH KARM COLLECTS

We may collect Personal Data from you in the course of our Business, when you contact us or request information from us, when you instruct us to provide legal services, when you use our website, or as a result of your relationship with any of our personnel or clients.

The Personal Data that we process includes (“**Personal Data**”):

- Basic details, such as your name, role/title, employer/s, your relationship to a person, and your contact information (such as your email address, physical address, contact numbers);
- Identification information to enable us to check and verify your identity (e.g., your birthdate; your passport details), and information collected from publicly available resources to verify the same;
- Information relating to the matter on which you are seeking our legal services;
- Bank account or other financial information, if relevant to our engagement with you;
- Technical information (including your location, IP address, browser details, traffic data, location data), such as information from your visits to our website (page interaction information, length of visits, etc.), or in relation to marketing emails we send to you;
- Information relating to your visits to our offices or our meetings and events, including appointment details (e.g., time, location, participants) and other photographic or video images;
- Personal Data provided to us by or on behalf of our clients, or generated by us in the course of providing services to them, which may include special categories of personal data;
- Any other information relating to you which you may provide to us.

We may collect your Personal Data:

- As part of our new business intake and client on-boarding or client maintenance activities, and when you seek legal services from us;
- When you seek employment from us, as part of our new employee on-boarding and maintenance of the employment relationship;
- When you provide (or offer to provide) services to us, either yourself or on behalf of your employer;
- When we are acting on a matter where you or your employer are a party to the same;
- When you interact with our website, or use any of our online services;
- When you interact with us in respect of any of our marketing communications or events;

Please note that you will, generally, not be required to pay a fee to access your Personal Data (or to exercise any of the other rights), however, that we may charge a reasonable fee (determined at our sole discretion and which is payable by you if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request under the aforementioned circumstances, or where permitted by law to do so; or not being compelled to do so under law.

We may request specific information from you to help us to confirm and verify your identity, to ensure that you can exercise your rights to access your Personal Data or to exercise any of your other rights, as determined by contract, the law or otherwise. This is a security measure to ensure that Personal Data is not disclosed to any unauthorised person, who has no right to view, access or receive it. We may also contact you to ask you for further information in relation

to your request, to speed up our response to any request received from you, when you choose to exercise your rights.

If you fail, neglect and/or refuse to provide us with your Personal Data where we need to collect Personal Data by law, or under KARM' Terms and Conditions and you are not comfortable sharing the requested data with us, we may not be able to perform our services to you. In this case, KARM shall have the right to discontinue the services or service request, however applicable. KARM undertakes to notify you if this is the case at the time.

Here are the Personal Data points which KARM will collect from you or any third party who you have given consent to, to collect, process and share your data:

Personal Data collected from you

If you provide us feedback, contact us or subscribe to receive updates, we will collect your name and e-mail address (as applicable), as well as any other content included in form in which it was received (i.e., the details and content of an email), in order to send you a reply or in to contact you. We also collect other types of Personal Data that you voluntarily provide to us when contacting us – i.e., in seeking support services via email, information submitted via an online contact form, other contact information, or other information provided to support services staff.

Personal Data collected from third parties

We may also collect other Personal Data supplied by third-party entities (including governmental authorized entities, other organisations that you have dealings with, regulators, credit reporting agencies, information service providers, or from publicly available records or other Users) and service providers / agents in the outsourcing of services, including, but not limited to third party identity verification sources and services; and verification via social networking websites to facilitate the provision of KARM's services. We will gather information from third parties and service providers who you have authorized to collect, process and share your Personal Data.

The information you provide may be confidential, and we will maintain such confidentiality and protect your information in accordance with our professional obligations and applicable law. We have arrangements in place with personnel and service providers who may process your personal information, to ensure that confidentiality is maintained.

KARM'S USE OF THE INFORMATION IT COLLECTS

We will only use your Personal Data in a legally compliant manner. All our use and processing of your Personal Data will fall under these three heads:

1. Where we need to perform the services pursuant to a contract to which you a party or in order to take steps at the request of yourself prior to entering into a contract.
2. Where processing is necessary for compliance with a legal obligation to which we are subject under applicable laws.

We will not sell, distribute or lease your Personal Data to third parties in relation to the provision of services, unless we have your permission or are required by law to do so.

Using and Processing your Personal Data to provide you, our services

We may use and process your Personal Data to provide you KARM Facilities in these ways:

1. Providing legal services to you;
2. Communicating with you in respect of legal developments and the promotion of our legal practice;

3. Managing our business relationship with you (or your organisation), whether in connection with the provision of our legal services, the procurement of your goods and services, or as your employer (or potential or former employer), including processing payments, accounting, auditing, billing and collection and related support services;
4. Complying with our legal obligations, including with respect to legal and regulatory considerations (e.g. anti-money laundering and sanctions checks, audits, enquiries by regulatory authorities);
5. Managing and securing access to our premises and information technology systems, and monitoring the technology side of our operations;
6. Keeping your contact details accurate and current using information provided by you, or information publicly available;
7. To facilitate the internal record keeping with regards to the services availed by yourself.
8. To conduct data analyses functions and generate operational reports for usage of our services.
9. To respond to your inquiries or other requests received.
10. For any purpose related and/or ancillary to any of the above or any other purposes for which your personal data was provided to us.

Personal Data When Processed Without Consent

Please be advised that we may process your Personal Data without your knowledge or consent; and only where this is required or permitted by law. In general, the Personal Data submitted to us, is used either to respond to requests you make or to aid our service to you.

KARM may be compelled to surrender User information to legal authorities without express User consent, if presented with a court order or similar legal or administrative order, or as required or permitted by the laws, rules and regulations of any nation, state or other applicable jurisdiction.

Promotional information

We operate a client relationship management email mailing list program, which we use to inform clients and other contacts about our services, including our publications and events. Such marketing messages may contain tracking technologies in order to track subscriber activity relating to engagement, demographics and other data, and to build subscriber profiles. We use this as a means by which to undertake direct marketing.

If you would like to cease receiving marketing materials from us at any time, please let our team know directly. You can also change your preferences for receiving our marketing emails and legal updates from us at any time, and you can unsubscribe by following the instructions specified in our marketing emails or via the websites. Please update your details by contacting our team by email at karmadmin@karmadv.com.

HOW TO UPDATE YOUR INFORMATION

Whenever possible, you can update your Personal Data, subject to verification by KARM. If you wish for KARM to update your information, please contact us at karmadmin@karmadv.com to make the required changes.

YOUR LEGAL RIGHTS (USER RIGHTS)

Under the ADGM's data protection regulations, you have the following rights:

1. **Right to be informed:** This means that when an ADGM registered company collects Personal Data from you, it must make clear what they are processing, why, and who else the data may be passed/transferred to or shared with. You have the right to know who, why and how your Personal Data is processed or shared.
2. **Right of access:** You have the right to request us to confirm whether we hold any Personal Data in relation to you, the purpose of holding and processing the Personal

Data, the categories of Personal Data concerned, to whom the Personal Data has been disclosed (in particular any third-parties outside of the ADGM), the envisaged period for which such Personal Data will be retained or the criteria used to determine such period, the existence of all the other rights you may have as a Data Subject, where the Personal Data is not collected from you, any available information as to its source, the existence of automated decision-making, including profiling; and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences for you of such processing. Where your Personal Data is transferred outside of ADGM or to an international organisation, you have the right to be informed of the appropriate safeguards relating to the transfer.

3. **Right to rectification:** If you have provided your Personal Data to us you have the right to request us to correct, rectify or erase your Personal Data at any time.
4. **Right to be forgotten / erasure:** This is your right, under certain circumstances, whereby you can ask for your Personal Data to be deleted. This is also referred to 'the Right to be Forgotten'. This would apply if the Personal Data is no longer required for the purposes it was collected for, or your consent for the processing of that data has been expressly withdrawn, or where Personal Data has been unlawfully processed. Your right to ask for your Personal Data to be deleted (only under certain circumstances, especially if that data is no longer required by us for the purposes it was collected for processing the data you had expressly withdrawn or if we have unlawfully processed your Personal Data. Once deleted all your Personal Data will be removed from our systems and will not be recoverable.
5. **Right to restrict processing:** this is your right to ask for a temporary halt or pause in processing of personal data, such as in the case where a dispute or legal case has to be concluded, or the data is being corrected.
6. **Right to data portability:** This is your right to ask for any of your Personal Data supplied directly to the Data Controller which is processed pursuant to the provision of your consent, entering into a contract with the Data Controller or carried out by automated means, to be provided to you in a structured, commonly used, and machine-readable or electronic format.
7. **Right to object:** If you have provided your Personal Data to us, you have the right to subsequently object to the processing of your Personal Data; you have the right to be informed before your Personal Data is disclosed for the first time to third parties or to be used for direct marketing, and you are offered the right to object to such uses.
8. **Rights to file a complaint:** If you feel that your Personal Data has been misused or disclosed without your permission, or that any of your data privacy rights have been violated by an ADGM registered company, you have a right to file a complaint with the Office of Data Protection, ADGM. To file a complaint, kindly complete the [complaint forms](#) and send them via email to data.protection@adgm.com
9. **Rights in relation to automated decision making and profiling:** Your right not to be subject to a decision based solely on automated processing.
10. **Right to be notified:** This is your right to be notified regarding any rectification or erasure of your Personal Data or any restriction of Processing. We will further communicate any rectification or erasure of your Personal Data; or restriction of processing to each third-party to whom your Personal Data has been disclosed, unless this proves impossible or involves disproportionate effort.
11. **Right to withdraw consent:** This is your right to withdraw your consent at any time, specifically in a scenario where your Personal Data is being collected and processed pursuant to your initial consent. Any processing conducted lawfully prior to you withdrawing your consent will not be affected by the subsequent withdrawal of consent.

If you wish to exercise any of the rights set out above or any other laws concerning Personal Data (in so far as same is applicable), please contact us (karmadmin@karmadv.com) in the first instance, so that we may resolve your query, feedback or complaint amicably.

Automated decisions: Please note that at this time KARM does not utilise any automated decision making, however should we utilise such automated decision making in the future, we shall amend this Privacy Policy and will notify you of the same. At such a time, you may contest

any automated decision by KARM which has been made about you and where this has a legal or similar significant effect and ask for it to be reconsidered.

Time limit to respond to User requests in exercising your rights: We aim to respond to all legitimate requests without undue delay and within two (2) months calendar of receipt of any request from you. Occasionally it may take us longer than two (2) months if your request is particularly complex, or if you have made duplicated or numerous requests. In this case, we will notify you of receipt of such request(s) and keep you updated as to the status of progress concerning such request(s).

DATA RETENTION AND RECORDS

We will retain your personal information for the length of time needed to fulfil the purposes for which it was collected, unless we specifically agree a longer retention period with you, or a longer retention period is required or permitted by law.

HOW KARM TRANSFERS AND SHARES USER'S PERSONAL DATA

1. We disclose your Personal Data, as described in this Privacy Policy.
2. It may be necessary to disclose your information to law enforcement agencies, regulators, government/public officials, or other relevant third parties to comply with any law, subpoenas, court orders, government requests, to defend against legal claims, investigate or bring legal action against illegal or suspected illegal activities, to enforce our [Terms and Conditions](#) , or to protect the rights, safety, and security of KARM, our Users, other persons or the public.
3. We may share your Personal Data with third parties and/or service providers such as payment processors and for the integration of customer relationship management functionality etc., in so far as it may be necessary and in order to provide you our services and to conduct quality assurance testing; to provide operational support; to verify your identity; and/or to provide other services to KARM and any facilities of KARM. These third-party service providers are required not to use your Personal Data for any purpose, other than to provide the services mandated by us.
4. We may share some or all of your Personal Data with third parties (i.e. if KARM is acquired by a new owner) in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Personal Data may also be transferred as a business asset forming part of KARM' good will. If another company acquires KARM, its business or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations held by KARM regarding your Personal Data, as described in this Privacy Policy.
5. If you tell us you wish to attend an event, your name and organisation may appear on a list which we provide to other delegates at the event. We also take photographs and video of our events, and this may result in your image being captured and used in the course of reporting on the event (e.g. via social media or other means); we will draw this to your attention in materials relating to the specific events.

Links to third-party websites

KARM communications may contain links to other third-party websites which are not owned or operated by KARM and too, which are regulated by their own privacy policies. If you click on a third-party link, you will be directed to that third party's site. KARM strongly advises you to review the privacy policy of every site you visit. KARM is not responsible for the privacy policies of these third-party websites, regardless as to whether they were accessed using the links from our facilities. KARM has no control over and assumes no liability for the content, privacy policies or practices of any third-party sites or services.

KARM specifically herein mandates that you, as the User (as per this Privacy Policy) to visit, familiarize, understand the below entity policies, being partners of KARM in providing services under the facilities to you, however – even if not done as mandated herein, you as the User

accepts the terms of their individual privacy policies, cookies policies, as well as terms and conditions, as third-party service providers to KARM.

Other than as stated in this Privacy Policy, KARM does not disclose any of your Personal Data to any third parties, unless required to do so by law enforcement, court order, or in compliance with legal reporting obligations.

DATA STORAGE AND DATA TRANSFERS

User Data is stored and transferred in compliance with the applicable legislation or regulations of the jurisdiction in which KARM operates.

We store and process your Personal Data in data centers within the USA (with primary storage being in Washington, and their back up storage located in Texas), or where KARM's mandated service providers are located.

Regardless of where you are based globally, your Personal Data may be stored, processed and transferred outside of the ADGM in compliance with the ADGM's data protection and data management regulations as and however applicable and/or required.

Some of our external third parties are also based outside of the aforementioned geographical regions and globally, so, their processing of your Personal Data will involve the transfer and storage of data outside the aforementioned territories. We reiterate that you, as the User, hereby accepts the terms of their individual privacy policies, cookies policies, as well as terms and conditions of third-party service providers to KARM and too which should include all third-party vendors.

Some of the international organisations and countries to which your Personal Data may be transferred do not benefit from an appropriate data protection regulatory framework. For such international organisations and countries, we shall transfer your Personal Data, only upon ensuring that a suitable degree of protection is afforded to it through the implementation of the necessary safeguards, such as an adequacy decision by the Commissioner of Data Protection, adequate binding corporate rules or through the inclusion of standard contractual clauses in our agreements with such organisations and countries. We shall notify you with regards to the specific safeguard we shall adopt in transferring your Personal Data to such an international organisation and/or country if you must require such data.

In respect of the ADGM's data protection and data management regulations relating to the transfer of Personal Data, transfers will be conducted in accordance with the ADGM regulations. Please contact us (karmadmin@karmadv.com) if you want further information on the specific mechanism used by us when transferring your Personal Data.

LEGAL RECOURSE TO RELEVANT AUTHORITIES

You have the right to make a complaint at any time to the Office of Data Protection at the ADGM if there is an infringement of the ADGM's extant data protection regulations. However, we would appreciate the opportunity to address your concerns before you approach the ADGM. Please contact us in the first instance (karmadmin@karmadv.com) so that we may try to resolve your complaint swiftly and satisfactorily.

SECURITY PRECAUTIONS AND MEASURES EXERCISED BY KARM FOR PROTECTION OF YOUR DATA

We are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

KARM facilities are scanned on a regular basis for security holes and known vulnerabilities, to best ensure its security.

Your Personal Data is contained behind secured networks and is only accessible by a limited number of individuals who have special access rights to such systems and are required to keep the information confidential.

No guarantee

Please note that no transmission over the Internet or any method of electronic storage can be guaranteed to be absolutely 100% secure, however, our best endeavours will be made to secure data and the ability to access your Personal Data.

Without prejudice to our efforts on protection of your data, nothing contained in this Privacy Policy constitutes a warranty of security of the facilities, and you agree to transmit data at your own risk.

Please note, that KARM and the facilities do not guarantee that your data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

If you do receive any suspicious communication of any kind or request, do not provide your information and report it us by contacting our offices immediately on +971 55 369 2517.

Since we cannot guarantee against any loss, misuse, unauthorised acquisition, or alteration of your data, please accept that you play a vital role in protecting your own Personal Data, including the adoption of sufficient safety measures.

Furthermore, we cannot ensure and do not warrant the security or confidentiality of data transmitted to us, or sent and received from us by Internet or wireless connection, including: email, phone, or SMS, since we have no way of protecting that information once it leaves and until it reaches us. If you have reason to believe that your data is no longer secure, please contact us (karmadmin@karmadv.com).

Lastly, please note that should your Personal Data be breached and the security of your rights be at high risk, we shall promptly and immediately communicate to you the nature of the breach which has taken place, the likely consequences of such a breach and shall describe thoroughly the measures we have implemented to address the breach and to mitigate any and all adverse effects to you and your rights. In the unlikely event of a breach occurring, please reach out to us at karmadmin@karmadv.com for further information and for further advise on how to mitigate the potential adverse effects of such a breach

We also aim to conduct all applicable security risk assessments to ensure the availability of risk mitigation controls, to better safeguard the integrity of User data.

GENERAL

In the case of abuse or breach of security, we are not responsible for any breach of security or for any actions of any third parties which receive the information illegally.

We will not distribute customer information to be used in mailing lists, surveys, or any other purpose other than what is required to perform our services.

CONTACTING US

If you have any questions about our Privacy Policy as outlined above, or if you have any complaints, please contact us on +971 55 369 2517.

If you have any queries or issues pertaining to your information or our privacy policy or Personal Data, then please do write to us at any time by emailing KARM via karmadmin@karmadv.com .