

## 1 - Data protection under the EU General Data Protection Regulation (EU GDPR)

The EU GDPR aims to harmonize data protection law across EU Member States and introduces higher data protection standards as well as transparency of personal data collection and processing. J.Chahine Capital (“JCC”, “we”, “our”, or “us”) takes your privacy seriously. This privacy notice contains general information on what personal data JCC collects, what it does with that information, and what rights you have. If you have any questions or comments, please contact [gdpr@chahinecapital.com](mailto:gdpr@chahinecapital.com).

‘Personal data’ is any information that relates to an identified or identifiable natural person (rather than to a legal entity, such as a company).

As part of our commitment to protect your personal data in a transparent manner, we want to inform you:

- why and how JCC collects, uses and stores your personal data;
- the lawful basis on which your personal data is processed; and
- what your rights and our obligations are in relation to such processing.

## 2 - What types of personal data do we collect ?

JCC will, depending on the service we provide to you (if any), collect and process personal data about you including:

- personal details such as your name, phone number, physical and electronic address;
- where applicable, professional information about you, such as your job title and work experience;
- when you access our Website, data transmitted by your browser and automatically recorded by our server, including date and time of the access, name of the accessed file as well as the transmitted data volume and the performance of the access, your web browser, browser language and requesting domain, and IP address (additional data will only be recorded via our Website if their disclosure is made voluntarily, e.g. in the course of a registration or request). Our website will contain additional information about how we use your information while you are visiting that website.

We will never register or maintain “sensitive data” (personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, and the processing of genetic or biometric data, data concerning health or data concerning a natural person’s sex life or sexual orientation or criminal convictions and offences or related security measures)

## 3 - On which legal basis and for which purposes do we process personal data?

### 3.1 – Legal basis for processing

Depending on the purpose of the processing activity (see section 3.2), the processing of your personal data will be one of the following:

- necessary for the legitimate interests of JCC, without unduly affecting your interests or fundamental rights and freedoms;
- necessary for taking steps to enter into or executing a contract or a service agreed between us;
- required to meet our legal or regulatory responsibilities;

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or enter into an agreement with you, if we cannot collect this personal data there is a possibility we may be unable to on-board you as a client or provide services to you (in which case we will inform you accordingly).

### **3.2 – Purposes of processing**

We always process your personal data for a specific purpose and only process the personal data which is relevant to achieve that purpose. In particular, we process personal data for the following purposes:

- a) providing services to you and ensuring their proper execution;
- b) managing our relationship with you, including communicating with you in relation to the products and services you obtain from us;
- c) contacting you for direct marketing purposes about our products and services;
- d) any other purposes we notify to you from time to time.

## **4 - Who has access to personal data and with whom are they shared ?**

### **4.1 – Service providers**

In some instances, we share personal data with our suppliers, including companies of our group and other business partners who provide services to us, such as IT and hosting providers, marketing providers, communication services and printing providers, and others. When we do so we take steps to ensure they meet our data security standards, so that your personal data remains secure.

### **4.2 – Public or regulatory authorities**

We could disclose personal data to public authorities, regulators or governmental bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so.

### **4.3 – Others**

We could disclose personal data to public authorities, regulators or governmental bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so.

## **5 - International transfers of personal data**

The Recipients referred to in section 4 above can be located outside the European Economic Area. In those cases, except where the relevant country has been determined by the European Commission to provide an adequate level of protection, JCC requires such recipients to comply with appropriate measures designed to protect personal data contained within a binding legal agreement.

## **6 - How long do we store your data?**

We will only retain personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements.

## **7 – Your rights**

You have a right to ask JCC to rectify inaccurate personal data we collect and process and the right to request restriction of your personal data pending such a request being considered.

Where we process your personal data on the basis of your consent, you have the right to withdraw that consent at any time. Please also note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

You have a right to ask us to stop processing your personal data, or to request deletion of your personal data (known as the 'right to be forgotten') – these rights are not absolute under the EU GDPR (as sometimes there may be overriding interests that require the processing to continue, for example), but we will consider your request and respond to you with the outcome. When personal data are processed for direct marketing purposes, your right to object extends to direct marketing, including profiling to the extent it is related to such marketing. You may object to direct marketing by clicking the "unsubscribe" link in any of our emails to you, or by emailing us at [info@chahinecapital.com](mailto:info@chahinecapital.com) at any time.

Where we process your personal data on the basis of your consent, or where such processing is necessary for entering into or performing our obligations under a contract with you, you may have the right to request your personal data be transferred to you or to another controller (known as the 'data portability' right). You also have the right to ask JCC for a copy of some or all of the personal data we collect and process about you.

You can exercise the rights set out above using the details in section 8 of this notice.

## **8 - Exercising your rights, and complaints**

If you are not satisfied with any aspect of the processing of your personal data by JCC, we would like to discuss it with you to understand how we can rectify the issue. If you would like to speak to us about our use of your personal data, you can contact by emailing [gdpr@chahinecapital.com](mailto:gdpr@chahinecapital.com) or via mail.

If you are not satisfied with JCC's response, you have the right to make a complaint to the data protection authority in the jurisdiction where you live or work, or in the place where you think an issue in relation to your data has arisen.

## **9 – Security Note**

We have in place appropriate technical and organizational measures to prevent unauthorized or unlawful access to the personal data. As complete data security cannot be guaranteed for communication via e-mails, instant messaging, and similar means of communication, we would recommend sending any particularly confidential information by an alternative secure means.

## **10 – Changes to personal data**

We are committed to keeping your personal data accurate and up to date. Therefore, if your personal data changes, please inform us of the change as soon as possible.

## **11 - Status of this privacy notice**

This privacy notice was written in May 2018. It is a notice explaining what JCC does, rather than a document that binds JCC or any other party contractually. We reserve the right to amend it from time to time. If the notice has been updated, we will take steps to inform you of the update by appropriate means, depending on how we normally communicate with you.