

1. EXPO CITY DUBAI LLC. -SO, DATA PRIVACY AND COOKIE POLICY

Definitions

"EU" shall mean the European Union.

"GDPR" shall mean the 'General Data Protection Regulation', Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data.

"UAE" shall mean the United Arab Emirates.

- 1.1 The entity responsible for your Personal Data is Expo City Dubai LLC. SO.
- **1.2** Expo City Dubai is a Limited Liability Company incorporated in the Emirate of Dubai, United Arab Emirates whose principal place of business is located at PO Box 2020, Dubai, United Arab Emirates.
- **1.3** Expo City Dubai, and our affiliates and branch offices (also referred to as "we" and "us"), take our data protection and privacy responsibilities seriously. This Data Privacy and Cookie Policy ("**Privacy Policy**") describes how we collect, process, use, disclose and transfer your Personal Data as a "data controller". A "data controller" is an entity which determines why and how it processes Personal Data it possesses. This Privacy Policy covers instances when you contact us, use our services and products or interact with our websites, such as www.expocitydubai.com, and any Expo City Dubai mobile applications (together " **Expo City Dubai Websites**").

2. TERMS OF USE

2.1 Use of the Expo City Dubai Websites is subject to our DATA PRIVACY AND COOKIE POLICY ("**Policy**"). Please ensure you read them carefully and understand them. In jurisdictions where your consent to this policy is required you hereby consent to it and agree to be bound by this Policy and Terms.

2.2 Policy Applicability

The Data Privacy and Cookie Policy applies to Virtual and website visitors, ticket buyers, media professionals, Expo City Dubai mobile app users and third parties. Please refer section 5 in this policy to understand what is Personal Data and how and why Expo City Dubai uses your data.

2.3 Data accuracy

The accuracy of your data is important to us. You are required to provide us with correct and accurate information. Whenever necessary we also enable you to correct the data that you provided to us through self-service and our customer service.



3. UPDATES

3.1 Expo City Dubai will make necessary changes to this privacy policy at its sole discretion wherever or whenever required without any notice. However, we would recommend that you look at this policy from time to time to check for any updates.

4. THIRD PARTY WEBSITES

- **4.1** Expo City Dubai Websites may link you to other websites, including those of our service providers, advertisers and affiliates. We are not responsible for the way in which third party websites operate or the way in which they may process any Personal Data, which you provide to them. It is important that you understand this and check their respective privacy policies and terms of use.
- **4.2** We may also, from time to time, partner with advertising networks and other online advertising providers in order to deliver advertisements on our behalf or on behalf of other non-affiliated parties on our websites and across the Internet. These advertisements may be presented to you based on products and services the advertising providers think are relevant to your interests. These preferences may be inferred based on information collected about your browsing behavior on our websites and other non-affiliated sites and apps across time.

5. WHAT PERSONAL DATA WE COLLECT AND WHEN AND WHY WE USE IT

5.1 What is Personal Data?

5.1.1 Personal Data in this Privacy Policy means any information relating to an identified or identifiable natural person (a 'data subject'). An identifiable natural person is a person who can be identified, directly or indirectly, in particular by reference to an identifier Expo City Dubai may collect such as name, an identification number, location data or special categories of Personal Data relating to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

The Personal Data we collect is based on the Expo services you chose to use, as described in the subsequent sections. **5.2. When and why is Personal Data collected?**

5.2.1 Purchasing tickets or other Expo City Dubai products

- a) If you use the Expo City Dubai Websites to purchase tickets, merchandise etc., we will collect and use information about you as necessary to manage the purchase. This may include Personal Data such as your name, date of birth, address, contact information (such as phone number and e-mail address), as well as information collected about your navigation patterns on our websites. We may also seek to collect special categories of information from you in order to enhance your purchase and visitor experience. These special categories of information may include details such as health related information.
- b) If you purchase a ticket from us, to help you to create personalized pathways through the Expo City Dubai site on the basis of your preferences which we will have ascertained from your navigation of Expo City Dubai Websites and, once you are on the Expo City Dubai site, through location tracking carried out through our mobile application.



5.2.2 Customer Support and online services

- a) If you contact us by way of email, live chat, message boards or any other facility made available by Expo city Dubai with a query or comment about any of our services or products, or would like us to keep you informed about latest news and developments at Expo city Dubai through our newsletter or other means (for example, direct marketing), we will need to collect information about you (including your contact details) to help us respond to your query or request or provide our services to you. We may do this when you call our customer support center, or interact with us through our online support tools. This information may include identification data (such as your name, date of birth, gender, nationality etc.), contact details (such as email address and telephone number) and other information (such as your interests and personal preferences and transaction history).
- b) We may also keep a record of any communications we have with you (including a recording of any calls you make). We do this to help monitor and improve the quality of our customer support services, to make and defend legal claims, and to comply with legal obligations to which we are subject.

5.2.3 Creating registered accounts on Expo City Dubai Websites

- a) There are a number of sections of the Expo City Dubai Websites which we require you to register for in order to be able to make full use of the services available under them.
- b) If you register with us to create an Expo City Dubai Websites account, we may process your Personal Data to:
 - Manage your access to certain parts of Expo City Dubai Websites and, if applicable, allow you to make certain purchases (such as tickets and merchandise) or receive certain services:
 - Send you newsletters and marketing and promotional materials (including via social media, based on the contact details you provide us), subject to your marketing preferences;
 - Offer you the opportunity to download digital souvenirs following your visit to Expo city Dubai (if applicable).
- c) If you register with us to create an Expo City Dubai Websites account, the Personal Data we will collect from you may include identification data (such as your name, age, gender and country of residence), contact details (such as your email address, phone number and address), your preferences (which we can ascertain from the way in which you have navigated the Expo City Dubai Websites), and may also include professional information about you and your photo. If you choose to register an account with us by using a third-party app (such as Facebook or Twitter), you will be presented with a dialogue box which will ask your permission to allow Expo City Dubai to access your Personal Data from that third-party app (e.g. your full name, date of birth, email address and any other information



you have made publicly accessible). Please note that any information that is not required will not be retained by Expo City Dubai.

d) If you create an account with us, we may use your Personal Data to verify your identity when using the Expo City Dubai Websites. We may also use your contact details to send you transactional and other non-marketing email messages pertaining to your account and provide certain other account maintenance services to facilitate your transactions with Expo City Dubai and/or your use of the services we offer on Expo City Dubai Websites.

5.2.4 Events and Promotions

a) From time to time we hold events and special promotions to introduce Expo City Dubai to interested parties. If you come to one of these events, or take part in a promotion, we may ask for your personal details to help us run the promotion and keep in touch with you about our services and any special offers or competitions that we think may be of interest. Any information which you provide will be used in accordance with the terms of this Privacy Policy and you can unsubscribe from further communications from us at any time.

5.2.6 Participation in Expo City Dubai

a) If you contact us with a view to becoming a business partner of Expo City Dubai or to attend Expo City Dubai in a business capacity, we will need to collect information about your business, which may include Personal Data (for example, your contact details) to help us respond to your query or request. We may do this when you call us, or interact with us through our online support tools. The information we collect may include for example your name, date of birth, address, email, telephone number, your photograph, passport details, visa details (if applicable), bank account details.

5.2.8 Application users

a) If you use Expo City Dubai application to browse our services, we may collect information about you as necessary to enhance your user experiences as part of fulfilment. This information may include your name, date of birth, country of residence, gender, age brackets, language, nationality, contact details (such as e-mail address), geolocation data, unique identifier (such as device or person) and third-party data about you, for example, your Twitter, Facebook or other social media profiles.

5.2.9 Media Professionals

 a) We will collect your personal information as necessary to issue permits and manage access to Expo City Dubai site. This information may include name, date of birth, email id, mobile number, nationality, organization, photo ID (Emirates ID or Passport number)

5.2.10 Additional information

a) Sometimes we will require you to provide additional Personal Data. When we do this, we will
provide further information about why we are collecting it and how we will use it. Where we
provide personalized content, we may ask your permission to review third party data about



you, for example, your Twitter, Facebook, LinkedIn, Google+, Weibo, We Chat to get to know you better and to provide more effective personalization.

5.2.11 Information posted by you

a) The information posted by you on public areas of Expo City Dubai Websites or elsewhere on the internet may be used by anyone including Expo City Dubai.

5.2.12 Tracking and Automatic Collection

- a) Expo City Dubai and third parties that provide content, advertising, or other functionality on our services, may use Cookies, pixel tags, local storage, and other technologies to automatically collect information through the services. These are collected for the purposes of:
 - Developing the design and style of our products and services to make improvements;
 - Carrying out statistical, technical and logistical analysis and strategic development;
 - Carrying out market research;
 - Understanding more about you such as your location and demographic information; and
 - Providing you with personalized services, such as recommendations on our websites, apps and in direct marketing and tailored advertising.
 - Expo City Dubai Websites collect information about how you use our content online, and the device(s) you use to access the site. This includes collecting unique online identifiers such as IP addresses, which are numbers that can uniquely identify a specific computer or other network device on the internet.

6. LAWFUL BASES FOR USING YOUR DATA

- **6.1** We will only collect, use and share your Personal Data where we have an appropriate lawful basis to do so. Depending on where you are, appropriate legal bases may include:
- **6.1.1** where we need to use your Personal Data to perform a contract or take steps to enter into a contract with you;
- **6.1.2** our legitimate interests as an organization, for example we may use customer contact information to keep our customers informed about changes to the Expo City Dubai and other important service messages;
- **6.1.3** where we need to use your Personal Data to comply with a relevant legal or regulatory obligation that we have; and



6.1.4 where we have your consent to use your Personal Data for a particular activity. If you are a data subject in the UAE, this will always be the legal basis upon which your Personal Data will be processed.

7. HOW WE SHARE INFORMATION WITH OTHERS

- **7.1** We work closely with a number of trusted partners with whom we may need to share your Personal Data to help us provide our services, such as:
- 7.1.1 banks and payment providers, to authorize and complete payments;
- **7.1.3** third parties who help manage our business and deliver services. For example, these may include IT service providers who help manage our IT and back office systems, or third-party booking agents.
- **7.1.4** We may share your Personal Data with our partners who may send you marketing and promotional information.
- **7.1.5** From time to time we may share information about you with government organizations and agencies, including international organizations, to comply with applicable laws, regulations and rules, and legitimate requests from law enforcement, regulatory and other government or international agencies, or when to do so is in our legitimate interests, even if we are not compelled to share that information by applicable law.
- **7.2** If, in the future, we sell or transfer some or all of our business or assets to a third party, we may disclose or transfer information to a potential or actual third-party purchaser of our business or assets.

8. MORE ABOUT DIRECT MARKETING, PROFILING AND AUTOMATED DECISION MAKING

8.1 Direct marketing

- **8.1.1** We are committed to keeping you informed about Expo City Dubai and our products and services in line with your personal preferences.
- **8.1.2** We will usually send this by email but we may choose to contact you in other ways for example by phone, post, SMS and/or other electronic means if that is more appropriate.

8.2 Managing your marketing preferences

- **8.2.1** To protect privacy rights and to ensure you have control over how we manage marketing with you:
 - a) we will take steps to limit direct marketing to a reasonable and proportionate level and only send you communications which we believe may be of interest or relevance to you;



- to stop receiving marketing material from us, you can click the "unsubscribe" link that you will find on any electronic communications which you receive from us, or, for other types of communications, by contacting us; and
- c) you can change the way your browser or device manages Cookies, which may be used to deliver online advertising, by following the settings on your browser as explained in the "Cookies" section (section 11) below.
- **8.2.2** We recommend you routinely review the privacy policies and preference settings that are available to you on any social media platforms.

8.3 More about profiling and analytics

- **8.3.1** We use some of the information you provide to us in order to perform profiling and analytics with the data.
- **8.3.2** One of the methods by which we do this is by installing and using Cookies on your browser or device. You can learn more about how to adjust settings relating to Cookies on your browser and device, and about our Cookie Policy in the "Cookies" section (section 11) below.
- **8.3.3** Some of the legitimate purposes according to which we profile and analyse data include:
 - a) to allow us to enhance our provision of services to you;
 - b) to provide you with tailored content online and optimize your experience of our websites;
 - c) to offer personalized products when you use our services;
 - d) to obtain a better understanding of our customers, what you would like to see from us, and how we can improve our services for you;
 - e) to share advertising material, we believe may be of interest to you, including from our thirdparty partners; and
 - f) to help us operate our services more efficiently.
- **8.3.4** If you are using Expo City Dubai Websites from a location in the EU or a country with similar data protection laws, we will only profile your Personal Data on the basis of our legitimate interests if this does not override your own interests or fundamental rights and freedoms.

9. CROSS BORDER TRANSFERS

- **9.1** We operate our organization from the United Arab Emirates ("**UAE**"), where we have our head office.
- **9.2** In performing our operations we may need to transfer data, including your Personal Data, to the European Union ("**EU**"), in the event it leaves the EU and/or the UAE. Our third-party service



providers may also need to transfer your Personal Data to third countries outside the EU in order to perform their services.

- **9.3** We will take appropriate steps to ensure that transfers of Personal Data are in accordance with applicable laws and carefully managed to protect your privacy rights and interests. If your Personal Data is being transferred outside the EU then transfers will be limited to countries which are recognized as providing an adequate level of legal protection as assessed by the European Commission or where we can be satisfied that alternative data protection arrangements are in place to protect your privacy rights. To this end, if required by law, where we transfer your Personal Data to third parties who help provide our products and services, we obtain contractual commitments from them to protect your Personal Data.
- **9.4** You have a right to contact us for more information about the safeguards we have put in place (including, for EU data subjects, the right to receive a copy of relevant contractual commitments we have put in place, which might be redacted) to ensure the adequate protection of your Personal Data when this is transferred as mentioned above. See also the section titled "Your Rights" (section 12), below.

10. HOW WE PROTECT AND STORE YOUR INFORMATION

10.1 How we protect your information

- **10.1.1** Expo City Dubai invests in an appropriate and reasonable level of cyber security measures and practices to keep your Personal Data secure and confidential, including but not limited to:
 - Restriction of access to your Personal Data including through password protection and, in some cases, encryption and ensuring that Personal Data is used only on a strictly need-toknow basis, such as responding to an inquiry or service requests;
 - b) Implementation of physical, electronic, administrative, technical, and procedural safeguards to protect your Personal Data from unauthorized or inappropriate access, alteration, disclosure and/or destruction.
- **10.1.2** Where you disclose information to us using our mobile app, please ensure that your device remains safe. We cannot be held responsible for any data misuse arising from unauthorized access to your device.

10.2 Storing your Personal Data

- **10.2.1** We will store your Personal Data for as long as reasonably necessary for the purposes for which it was collected, as explained in this Privacy Policy.
- **10.2.2** In some circumstances we may need to store your Personal Data for longer periods of time, for instance where we are required to do so in accordance with legal, reporting, regulatory, tax, accounting requirements. Should you require information about how we retain particular information you can contact us.



- **10.2.3** In specific circumstances we may store your Personal Data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings.
- **10.2.4** To determine the appropriate retention period for Personal Data, we will consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of Personal Data, the purposes for which we process the Personal Data and whether we can achieve those purposes through other means.

11. COOKIES

11.1 Our policy on "Cookies"

- **11.1.1** A cookie is an element of data that a website sends to your browser, which then stores it on your system. Cookies may collect Personal Data about you. Cookies allow us to understand who has seen which pages and advertisements, to determine how frequently particular pages are visited and to determine the most popular areas of our website. Cookies also allow us to make Expo City Dubai Websites more user-friendly by, for example, allowing us to take you to the language site of last use, so that we can give you a better experience when you return to our website.
- **11.1.2** Cookies will be deployed on your device when you visit Expo City Dubai Websites unless you indicate that you do not wish this to happen or if you have turned this feature 'off' in your web browser or device settings.
- **11.1.3** Only the issuer of the cookie concerned may read or modify the information contained therein.
- **11.1.4** Most Cookies won't collect information that identifies you. Instead, they will collect more general information such as your general location or how you arrive at and use our website.

11.2 Cookies deposited by a third party on Expo City Dubai Websites

- **11.2.1** Our websites may contain Cookies issued by third parties (e.g. communication agency, audience measurement company, targeted advertising provider, etc.) allowing them, during the validity period of their Cookies:
 - a) To collect browsing information about browsers browsing our websites; and
 - b) To determine the advertising content that may correspond to your interests; and
 - c) To send you targeted advertising, in view of your browsing history collected by the third party.
- **11.2.2** At any time, you can prevent the collection of information about you via these third-party Cookies, by clicking on the corresponding links (see section 11.3 below).



11.2.3 The issue and use of Cookies by a third-party company is subject to the respective company's own terms of use.

11.3 Your management and use of Cookies

- **11.3.1 Enabling our websites to function properly:** some Cookies are essential for the operation of our websites e.g. we use Cookies to ensure that you are shown correct webpages for your location, or to identify when we have broken links or other technical issues with the website.
- **11.3.2 Analyzing visitor behavior:** we use Cookies to analyze how our visitors use our websites and to monitor website performance. This allows us to provide a high-quality experience by making sure that our content and layout remains relevant to you.
- **11.3.3 Optimizing and personalizing**: Cookies are also used to optimize the webpages that you visit, and to personalize the content that we show you across all our digital assets, based on what we understand about your requirements
- **11.3.4 Managing your Cookies:** You can control whether to accept Cookies or not. If you decide to not accept Cookies, some features and services on our websites may not function properly. If you would prefer not to accept the Cookies, you can either set your browser not to accept any Cookies and/or manage and modify your use of Cookies.

12. YOUR RIGHTS - LEGAL RIGHTS AVAILABLE TO HELP MANAGE YOUR PRIVACY

- 12.1 You may have certain rights relating to your Personal Data depending on the country in which you access Expo City Dubai Websites. In some cases, depending on applicable legislation, such as GDPR, these rights may include: To be informed this right allows you to receive information from us about what Personal Data we collect and what do we do with it. The purpose of this Policy is to fulfil this right.
- To access your Personal Data (commonly known as a "data subject access request").
 This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- To erase your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Please note that for certain purposes we may be legally obligated to retain your data (see section 10.2).
- To restrict the processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data under the following circumstances:
 - a) if you want us to establish the data's accuracy;



- b) where our use of the data is unlawful;
- c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- To transfer your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- To object to the processing of Personal Data including how we use it for direct marketing purposes, provided you can justify your objection on the basis that your fundamental rights and freedoms override our legitimate interests or those of a third party. At the same time, you acknowledge that we (or a third party) may demonstrate that we (or they) have compelling legitimate grounds to process your information which may override your rights and freedoms."
- To obtain a copy of safeguards used when we transfer your Personal Data outside the jurisdiction in which the Personal Data were captured (as per paragraph 9.4).
- To lodge a complaint with your local data supervisory authority.
- **12.2** Please note that the rights referred to in paragraph 12.1 are not absolute and may be subject to our own rights with respect to the Personal Data.
- **12.3** You may raise your concerns with your local data protection authority directly. However, we would encourage you to contact us in the first instance as we aim to promptly resolve any concerns or complaints you may have in relation to our processing of your Personal Data.
- **12.4** You can exercise your rights by contacting us as set out in Section 16. Subject to legal and permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfill it. This may include asking you to confirm your identity or provide other information for security purposes before disclosing Personal Data to you. We may not always be able to address your request fully, for example if it would affect our duty of confidentiality to others, or if we are legally entitled to treat your request in a different way. We reserve the right to refuse your request if it is manifestly unfounded or excessive.
- **12.6** You have a right to contact us for more information about the safeguards we have put in place to ensure the adequate protection of your Personal Data when this is transferred as mentioned above.

13. INFORMATION ABOUT YOUR DEPENDENTS AND RELATED PERSONS



13.1 If you provide Expo City Dubai with Personal Data about your next of kin and/or related persons for emergency contact or any other purposes, it is your responsibility to inform such individuals about such activities and to obtain their consent, where necessary, to the processing (including transfer) of their Personal Data as set out in this Privacy Policy.

14. COLLECTION OF DATA FROM MINORS

14.1 If you are resident in the UAE and under 18 or, alternatively, are resident elsewhere and are not yet the relevant age of majority in the jurisdiction in which you reside, we are not permitted to contract with you directly. Where necessary by local legislation, by agreeing to this Privacy Policy, your guardian acknowledges and consents to the terms of this Privacy Policy on your behalf. If we seek your consent to process your Personal Data for a specific purpose in accordance with this Privacy Policy, such consent must be granted on your behalf by your guardian.

15. CONTACT US

- **15.1** If you have any questions, concerns or complaints regarding our compliance with this Privacy Policy and the data protection regulations, or if you wish to exercise your rights, please contact us. We will investigate and will attempt to resolve complaints and disputes and make every reasonable effort to honor your wish to exercise your rights as quickly as possible, in any event, within the timescales provided by applicable data protection laws.
- **15.2** In some countries, you may have a right to lodge a complaint with your local data protection supervisory authority. We ask that you please attempt to resolve any issues with us before referring to your local supervisory authority.
- **15.3** If you have any questions or comments regarding the processing of your personal information and Expo City Dubai's privacy practices or if you would like us to update information or preferences you provided to us, you can reach out to our data privacy office via email on Dataprivacy@Expocitydubai.ae