

# Data Protection Policy

Al Sharqi Shipping Co LLC

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## INTRODUCTION

At Al Sharqi Shipping Co. LLC, we are deeply committed to protecting the privacy and security of personal and business data entrusted to us. As a global logistics partner connecting customers to growth opportunities worldwide, we understand that proper data handling is essential to maintaining the trust our clients place in us.

Our approach to data protection reflects our core values of Constant Care, Growth is a Sum of Us, Lead with a HEART, Ethics + Uprightness, Our Name is Legacy, and Our OCD is Our Mojo. These values guide us in implementing responsible data practices that respect privacy while enabling efficient global logistics operations.

This Data Protection Policy outlines how we manage and protect personal data throughout its lifecycle, ensuring confidentiality, integrity, and availability in compliance with applicable laws including UAE Federal Law No. 45 of 2021 and other relevant international regulations like the General Data Protection Regulation (GDPR).

## 1. Purpose and Scope

### 1.1 Purpose

The purpose of this policy is to outline how Al Sharqi Shipping Co LLC manages and protects personal data throughout its lifecycle, ensuring confidentiality, integrity, and availability. It aims to ensure compliance with UAE Federal Law No. 45 of 2021 and other relevant international regulations like the General Data Protection Regulation (GDPR).

### 1.2 Scope

This policy applies to all personal and business data collected, processed, and stored by Al Sharqi Shipping Co LLC. It governs the handling of data from employees, clients, partners, and third-party vendors globally. The principles herein apply regardless of the data format or location. All employees, contractors,

and third parties handling data on behalf of Al Sharqi must comply with this policy.

## 2. Principles of Data Processing

Al Sharqi adheres to key data protection principles:

- **Lawfulness, Fairness, and Transparency:** Data is processed lawfully, fairly, and transparently.
- **Purpose Limitation:** Data is collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.
- **Data Minimization:** Only adequate, relevant, and limited data necessary for the purpose is processed.
- **Accuracy:** Data is accurate and kept up to date.
- **Storage Limitation:** Data is retained only for as long as necessary.
- **Integrity and Confidentiality:** Data is processed securely, protecting against unauthorized or unlawful processing, accidental loss, destruction, or damage.

## 3. Data Subject Rights

Al Sharqi is committed to facilitating the exercise of data subject rights in accordance with applicable laws (including UAE Federal Law No. 45 of 2021 and GDPR). These rights may include:

- **Right to Access:** Individuals can access their personal data.
- **Right to Rectification:** Individuals can request correction of inaccurate data.
- **Right to Erasure:** Individuals can request deletion of their data ("Right to be Forgotten").
- **Right to Restriction of Processing:** Individuals can request limitations on processing.
- **Right to Data Portability:** Individuals can receive their data in a structured, commonly used, and machine-readable format.
- **Right to Object:** Individuals can object to certain types of processing.
- **Rights related to Automated Decision Making:** Rights regarding decisions based solely on automated processing.

Requests to exercise these rights should be directed to the Data Protection Officer.

## 4. International Data Transfers

Personal data may be transferred to other Al Sharqi offices, branches, or third-party vendors globally for legitimate business purposes. Al Sharqi ensures that all international data transfers are safeguarded in line with UAE Federal Laws and GDPR. We are implementing legal mechanisms such as Binding Corporate Rules (BCRs) and Standard Contractual Clauses (SCCs) to ensure adequate data protection across borders. Transfers to countries without adequate data protection laws will be subject to appropriate safeguards.

## 5. Data Retention

Al Sharqi will retain personal data in accordance with business requirements while respecting applicable regulatory frameworks. We've established the following retention periods:

- Personal data related to business operations: 5 years
- Employment-related data: 3 years after termination
- Customer-related data: 3 years post-final transaction

### **Business and Regulatory Rationale:**

- Business operations data is kept for 5 years to support our operational continuity and financial record-keeping needs. This duration aligns with common commercial practice in the logistics industry while meeting record-keeping requirements in our primary jurisdictions.
- Employment data is retained for 3 years post-termination to address potential business and contractual matters. This period generally satisfies statutory employment record requirements while limiting unnecessary data storage.
- Customer data is kept for 3 years after the final transaction to maintain effective customer service and support potential future business. This approach balances commercial interests with data minimization principles recommended under the UAE Federal Law No. 45 of 2021.

Al Sharqi may adjust these periods based on evolving business needs or regulatory developments. We will implement appropriate measures to ensure data is securely removed from our systems when retention periods expire, in line with industry security standards.

## 6. Data Security

Al Sharqi implements appropriate technical and organizational measures to ensure a level of security appropriate to the risk of processing. This includes protecting data against unauthorized access, disclosure, alteration, or destruction. Security measures are based on industry standards and may include access controls, encryption, regular security assessments, and an Information Security Management System (ISMS) based on standards like ISO 27001. Suppliers and business partners are required to implement appropriate security measures.

## 7. Vendor and Third-Party Compliance

Al Sharqi ensures that all third-party vendors and business partners who process personal data on our behalf comply with applicable data protection laws and standards.

- **Due Diligence:** We conduct due diligence before engaging third parties who will process personal data.
- **Third-Party Contracts:** Contracts will be updated or will include specific data protection clauses requiring vendors to:
  - Implement appropriate data protection and security measures.
  - Comply with data protection laws, including GDPR and UAE Federal Law.
  - Notify Al Sharqi of any data breaches without undue delay.
  - Process data only according to Al Sharqi's documented instructions.
- **Auditing:** Annual audits by independent third parties may be conducted to verify vendor compliance.
- **Data Protection Impact Assessments (DPIAs):** DPIAs will be conducted, when necessary, particularly before entering into new vendor relationships involving high-risk data processing.
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## 8. Roles and Responsibilities

- **Senior Management:** Provide oversight and resources for data protection compliance.
- **Data Protection Officer (DPO):** Faizan Sheikh is the designated DPO. The DPO is responsible for overseeing data protection strategy and

- implementation, advising compliance, and acting as a point of contact for data subjects and supervisory authorities. Email: [dpo@alsharqi.co](mailto:dpo@alsharqi.co)
- **Employees:** All employees are responsible for handling personal data in accordance with this policy and applicable laws. Employees must report any suspected data breaches or security incidents immediately.
  - **Managers:** Ensure their teams understand and comply with the policy and provide necessary resources.
  - **IT Department:** Implement and maintain technical security measures.
  - **Legal and Compliance:** Provide guidance on data protection laws and contractual requirements.

## 9. Reporting and Compliance Mechanisms

Any questions, concerns, or potential violations related to data protection should be reported immediately to the DPO or through the company's Whistleblower channel. Al Sharqi will investigate reports promptly and discreetly. Compliance audits will be performed by external auditors and reviewed by senior management.

## 10. Policy Review and Updates

This policy will be reviewed annually or whenever there are significant changes in regulatory, operational, or business requirements. The DPO and senior management will review the policy, and it will be approved by the CEO before implementation. Material changes will be communicated to relevant stakeholders via email and published on the company website.

## 11. Implementation Guidance

- The DPO will provide guidance and training on this policy.
- Specific procedures for data handling, storage, access, and deletion will be developed.
- Processes for responding to data subject requests will be established.
- A data breach response plan will be maintained.
- Due diligence and contract update processes for vendors will be prioritized.

## 12. Related Policies

This policy should be read in conjunction with the Al Sharqi Shipping Co LLC Code of Conduct, Anti-Bribery and Corruption Policy (for accurate record keeping), Whistleblower Policy, and Supplier Code of Conduct.

## Contact Information

For any questions or concerns regarding this policy or to exercise data protection rights, please contact:

- **Data Protection Officer:** Faizan Sheikh
- **Email:** [dpo@alsharqi.co](mailto:dpo@alsharqi.co)
- **Address:** Al Safa C Bldg - Office 202 - 151 Khalid Bin Al Waleed Rd - Umm Hurair 1 - Dubai