

The “Privacy Policy Guideline” has been prepared in reference to the Personal Data Protection Law No. (24) for the year (2023) issued on the 17th of September, 2023 in the official gazette issue no. 5881.

****This document does not constitute a legal document or a legal advice. Hereby, the concerned party is not obligated to adhere to the provisions outlined herein.**

Privacy Policy Guideline	
Purpose	Providing guidance to concerned parties and stakeholders on how to prepare, develop, and maintain a comprehensive privacy policy that adheres to the Personal Data Protection Law No. (24) for the year (2023) and with reference to the European General Data Protection Regulation (GDPR).
Scope	This guideline targets parties concerned in complying with and implementing the Personal Data Protection Law No. (24) for the year (2023) in addition to parties concerned with processing personal data.

The Privacy Policy

When preparing and developing the privacy policy, the following should be considered:

- **Simplicity and Clarity:** Use clear, straightforward, and easy-to-understand language avoiding legal jargons that might confuse the user.
- **Transparency:** Be honest and open about the collected data and its intended use. The user should be able to easily understand the rights and how to exercise them.
- **Accessibility:** The policy should be available to and easily accessible by the user.
- **Conciseness:** The policy should be comprehensive yet concise. It should focus on essential information and key points that user needs to know and understand.
- **Compliance:** The policy should comply with the Personal Data Protection Law No. (24) for the year (2023) and the bylaws and instructions issued pursuant to it. It should cover all necessary aspects to ensure compliance with this law as well as any other legislation the responsible party is required to implement.
- **Periodic Review:** The policy should be reviewed regularly and updated when necessary whereby it should be updated in accordance with the Personal Data Protection Law No. (24) for the year (2023) and the bylaws and instructions issued pursuant to this law.

The Policy's Key Elements

The privacy policy should include - as a minimal requirement, the following:

1.	Overview	<ul style="list-style-type: none"> – Purpose of the privacy policy. – The scope.
2.	Data Controller and Processor Information	<ul style="list-style-type: none"> – Identify who is the controller and who is the processor. – Provide the contact information of both the controller and the processor.

3.	Categories of Personal Data	<ul style="list-style-type: none"> – Define the type and the category of data being collected and processed, and determine its sensitivity. – Clarify the methods of collecting the data taking into consideration data minimization and encryption (if required) and specify whether sharing the data is voluntary or mandatory.
4.	Purposes of Data Processing	<ul style="list-style-type: none"> – Clearly define the purpose and the objectives of data processing. – Determine the lawful basis of the processing. – Clearly specify the form and type of processing.
5.	Data Retention	<ul style="list-style-type: none"> – Determine the data retention period. – Clearly identify the reasons for retaining the data within a period exceeding the specified period and obtain a prior consent from the data subject. – Clarify the data deletion policy.
6.	Data Sharing and Transfer	<ul style="list-style-type: none"> – Clearly identify the parties with whom the data will be transferred to and/or shared with, and whether such parties are external. – Clearly state how the collected data will be transferred / shared and the related purpose. <p>**In case the parties were external, clearly state the implemented level of data protection.</p>
7.	Data Subject Rights	<ul style="list-style-type: none"> – Clearly outline the data subjects' rights. – Explain how data subjects can exercise such rights. <p>**Data subject rights include – but not limited to, the following: Right to Access Right to Rectification Right to Erase (right to be forgotten) Right to Object</p>
8.	Security Measures and Controls	<ul style="list-style-type: none"> – Clearly outline the security, technical, and organizational procedures and measures implemented to safeguard and secure the data. – Clearly explain how data subjects will be informed in case of any breach involving their personal data.
9.	Cookies and Tracking	<ul style="list-style-type: none"> – Provide a clear, direct, and easily accessible information about the used cookies, their purpose, and their storage retention. – Obtain an explicit consent from the data subjects before using the non-essential cookies. – Ensure that only necessary cookies are used in line with data minimization. – Clearly disclose any external or third parties' cookies.

		<p>**Provide a detailed cookie policy alongside with the privacy policy.</p>
10.	Policy Review and Update	<ul style="list-style-type: none"> – Clearly define the process of reviewing and updating the privacy policy and how data subjects will be notified of such update in addition to the procedure data subjects might need to follow after updating the policy. – Indicate the date of the last update and review. In case of policy being updated, state when the updated policy will be effective. <p>**A history log can be provided to track policy changes.</p>
11.	Complaint and Enforcement	<ul style="list-style-type: none"> – Clearly define the procedure of submitting a complaint by the data subjects in case of any abuse or violation to their rights whether such complaint is being submitted directly to the supervisory authority or to the organization itself. Such procedure should include – but not limited to, the methods by which the complaint is submitted (e.g., email, website) and the contact details of the supervisory authority. – Provide a statement confirming that data subjects have the right to lodge a complaint without adverse consequences. – Clearly state the actions that might be imposed on the organization itself in case of a non-conformity or a non-compliance with the Personal Data Protection Law including – but not limited to, penalties and fines, and corrective measures.
12.	Unauthorized Personnel or not legally Capable – if applicable	<ul style="list-style-type: none"> – Clearly define the process of disseminating this policy and the ways of obtaining a consent from the not legally capable data subjects.
13.	Consent	<ul style="list-style-type: none"> – Provide a clear procedure for collecting the prior consent from the data subjects concerned for the collection and the processing of their personal data and the process of consent withdrawal. – Clearly state the procedure followed if the data subjects do not wish to share their data or provide a prior consent.
14.	Contact Information	<ul style="list-style-type: none"> – This includes, but not limited to, the contact information of the Data Controller, Processor, Data Protection Officer (DPO), and the supervisory authority.

Version No.	Issue Date	Prepared by	Reviewed by	Approved by
1				

This document was prepared in reference with ISO 9001:2015 Quality Management System.