

Privacy Policy

Updated: 01.02.2025

1. General terms

This personal data processing policy is in accordance with the requirements of the Law No.15 of 2016 Personal Data Privacy Protection Qatar (hereinafter — Law on Personal Data) and defines the procedure for processing personal data and measures to ensure the security of personal data undertaken by LLC LEONI INTERNATIONAL FOR TRADE legal address: Office No. 5, Building No. 103, Street No. 740, Zone No. 79 - Qatar; Tax Reg No: 5007147960 (hereinafter — Operator) in relation to the processing of personal data of Website users <https://qatar.leoni.land>.

1.2. The Operator sets as its most important goal and condition of his activities the observance of human and civil rights and freedoms when processing personal data, including the protection of the rights to privacy, personal and family secrets.

1.3. The Operator's Privacy Policy (hereinafter - Policy) applies to all information that the Operator may obtain about visitors to the <https://qatar.leoni.land/> Website (hereinafter – Website).

1.4. The User is obliged to read this Policy in full before using the Website. Using the Website and filling out any forms on the Website by the User means full and unconditional acceptance by the User of this Policy.

1.5. This document is publicly available and is subject to posting on the official Website <https://qatar.leoni.land/>.

1.6. Operator may make changes to this Policy without prior notice to and/or approval of User. When making changes in the Policy title, the date of the last revision update is indicated. The new version of the Policy comes into force from the moment of its publication on the Website, unless otherwise provided by the new version of the Policy. In this regard, we recommend that you familiarize yourself with the Policy when you visit the Website again.

1.7. Operator may, at its discretion, notify User of any addition and/or modification to this Policy in a manner that Operator deems most appropriate. Use of the Website, materials and services offered on it means unconditional acceptance by the User of all conditions of this Policy. If the User disagrees with the current version of this Policy in whole or in part, he must immediately stop using the Website.

1.8. The administration acts as Controller, in accordance with Law on Personal Data.

2. Basic concepts used in the Policy

2.1. Automated processing of personal data — is processing of personal data using computer tools.

2.2. The blocking of personal data — is the temporary suspension of the processing of personal data (except in cases where processing is necessary to clarify personal data).

2.3. The Website - is a collection of graphic and informational materials, as well as computer software and databases that make them available on the Internet at the <https://qatar.leoni.land/> network address.

2.4. Personal data information system — is a set of personal data contained in databases and information technologies and technical means providing their processing.

2.5. Depersonalization of personal data — actions in which it is impossible to determine without the use of additional information the belonging of personal data to a particular User or other subject of personal data.

2.6. Processing of personal data — any action (operation) or set of actions (operations) performed using automation tools or without the use of such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

2.7. Operator — is a public authority, municipal body, legal or natural person, independently or jointly with other persons organizing and/or processing personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.

2.8. Personal data — any information relating directly or indirectly to a specific or defined User on the <https://qatar.leoni.land/> Website.

2.9. Personal data authorized by the subject of personal data for distribution — personal data, access to which the subject of personal data provides to an unlimited number of persons by giving consent to the processing of personal data, authorized by the subject of personal data for distribution in the manner prescribed by the Law on Personal Data (hereinafter - personal data authorized for distribution).

2.10. Subject or User — any visitor to the <https://qatar.leoni.land/> Website.

2.11. Provision of personal data — actions aimed at disclosure of personal data to a certain person or a certain number of persons.

2.12. Distribution of personal data — any actions aimed at disclosing personal data to an indefinite number of persons (transmission of personal data) or at familiarizing with personal data of an unlimited number of persons, including the publication of personal data in the media, posting in information and telecommunication networks or providing access to personal data in any other way.

2.13. Cross-border transfer of personal data — is the transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity.

2.14. Destruction of personal data — any actions as a result of which personal data is irrevocably destroyed with the inability of further restoration of the content of personal data in the information system of personal data and/or the material carriers of personal data are destroyed.

3. Purposes of collection and processing of personal data

3.1. Operator collects and/or processes Personal Data when filling out feedback forms on the Website and receiving services provided by Operator, including under separately concluded contracts, as well as when using or otherwise interacting with Operator products posted on the Website.

3.2. Operator shall collect and/or process Personal Data in order to enable full use of the Website, provide the User with the services offered by Operator on the Website, participate in research and marketing activities conducted by Operator.

3.3. Operator collects and stores only the personal information that is necessary for the provision of the Website services or the execution of agreements and agreements with the User, except for cases when the law provides for the mandatory storage of personal information for a period determined by law, including for the purpose of:

- User identification;
- providing the User with personalized services;
- communication with the User, including sending notifications, requests and information regarding the use of the Website, provision of services, as well as processing requests and applications from the User;
- conducting marketing campaigns for Users, including for the purpose of distributing offers to participate in the promotion and receiving prizes/rewards provided by the promotion;

- distribution of advertising and information materials over telecommunication networks, including through the use of telephone, Internet, mobile radiotelephone communication, or through direct contacts;
- targeting of mailings, advertising materials and other information brought to the attention of Users.

4. Personal data processed

Personal information that the User provides about himself on the Website, such as:

- for parents: e-mail, last name and first name;
- information provided about the child to whom the service will be provided: last name and first name, age, gender, school in which the child should study, class in which the child should study;
- data that are automatically transmitted to Operator in the process of using the Website using the software installed on the User's device, including: IP address, cookie information, information about the User's browser (or other program with which access to the Website 's services is carried out), access time, address of the requested page, as well as other data reported by the User in the process of using the Website.

5. Basic rights and obligations of the Operator

5.1. The Operator has the right to:

- receive from the subject of personal data reliable information and/or documents containing personal data;
- in case of withdrawal of his consent to processing of personal data by the subject, or request of termination of the processing of personal data, the Operator has the right to continue processing personal data without the consent of the subject of personal data if there are grounds specified in the Law on Personal Data;
- independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of the obligations provided by the Law on Personal Data and regulations adopted thereunder, unless otherwise provided by the Law on Personal Data or other laws.

5.2. The Operator is obliged to:

- provide the subject of personal data, at his request, with information regarding the processing of his personal data;
- organize the processing of personal data in accordance with the procedure established by the current legislation of the Qatar;
- respond to requests and inquiries from personal data subjects and their legal representatives in accordance with the requirements of the Law on Personal Data;
- report the authorized body for the protection of the rights of personal data subjects, at the request of this body, the necessary information within 10 days from the date of receipt of such a request;
- publish or otherwise provide unrestricted access to this Policy regarding the processing of personal data;
- take legal, organizational and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other unlawful actions in relation to personal data;
- cease transmission (distribution, provision, access) of personal data, cease processing and destroy personal data in the manner and cases provided for by the Law on Personal Data;
- perform other duties provided for by the Law on Personal Data.

6. Basic rights and obligations of personal data subjects

6.1. Subjects of personal data have the right to:

- receive information regarding the processing of their personal data, except for cases provided for by laws. The information is provided to the subject of personal data by the Operator in an accessible form, and it should not contain personal data relating to other subjects

of personal data, except in cases where there are legal grounds for the disclosure of such personal data. The list of information and the procedure for obtaining it are established by the Law on Personal Data;

- require the operator to clarify, block or destroy his personal data if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as take measures provided by law to protect their rights;
- make the processing of personal data subject to prior consent in order to promote goods, works and services on the market;
- withdraw consent to the processing of personal data, as well as to send a request to stop processing personal data;
- appeal to the authorized body for the protection of the rights of personal data subjects or to court against the unlawful actions or omissions of the Operator when processing his personal data;
- exercise other rights provided for by the legislation of the Qatar.

6.2. Subjects of personal data are obliged to:

- provide the Operator with reliable information about themselves;
- inform the Operator about clarification (updating, changing) of their personal data.

6.3. Persons who provide the Operator with inaccurate information about themselves or information about another subject of personal data without the consent of the latter are liable in accordance with the legislation of the Qatar.

7. Principles for processing personal data

8.1. The processing of personal data is carried out on a legal and fair basis.

8.2. The processing of personal data is limited to the achievement of specific, pre-defined and legitimate purposes. Processing of personal data that is incompatible with the purposes of collecting personal data is not permitted.

8.3. It is not allowed to combine databases containing personal data, the processing of which is carried out for purposes that are incompatible with each other.

8.4. Only personal data that meets the purposes of their processing are subject to processing.

8.5. The content and volume of personal data processed correspond to the stated purposes of processing. Redundancy of the processed personal data in relation to the stated purposes of their processing is not allowed.

8.6. When processing personal data, the accuracy of personal data, their sufficiency, and, where necessary, relevance in relation to the purposes of processing personal data are ensured. The operator takes the necessary measures and/or ensures that they are taken to delete or clarify incomplete or inaccurate data.

8.7. The storage of personal data is carried out in a form that allows the identification of the subject of personal data, no longer than required by the purposes of the processing of personal data, unless the period for storing personal data is established by law, an agreement to which the subject of personal data is a party, beneficiary or guarantor. The processed personal data is destroyed or depersonalized upon achievement of the processing goals or in the event of the loss of the need to achieve these goals, unless otherwise provided by law.

9. Conditions for processing personal data

9.1. The processing of personal data is carried out with the consent of the subject of personal data to the processing of his personal data.

9.2. The processing of personal data is necessary for the achievement of the goals provided for by an international agreement of Qatar or the law, for the implementation of the functions, powers and duties assigned to the Operator by the legislation of the Qatar.

9.3. The processing of personal data is necessary for the administration of justice, the execution of a judicial act, an act of another body or official, subject to execution in accordance with the legislation of Qatar on enforcement proceedings.

9.4. The processing of personal data is necessary for the execution of an agreement to which the subject of personal data is a party or beneficiary or guarantor, as well as for the conclusion of an agreement on the initiative of the subject of personal data or an agreement for which the subject of personal data will be a beneficiary or guarantor.

9.5. The processing of personal data is necessary for the exercise of the rights and legitimate interests of the operator or third parties or for the achievement of socially significant purposes, provided that the rights and freedoms of the subject of personal data are not violated.

9.6. The processing of personal data access to which is provided to an unlimited number of persons is carried out by the subject of personal data or at his request (hereinafter referred to as publicly available personal data).

9.7. The processing of personal data that is subject to publication or mandatory disclosure is carried out in accordance with law.

10. The procedure for collecting, storing, transferring and other types of processing of personal data.

The security of personal data processed by the Operator is ensured by implementing legal, organizational and technical measures necessary to fully comply with the requirements of current legislation in the field of personal data protection.

10.1. The Operator ensures the safety of personal data and takes all possible measures to prevent access to personal data by unauthorized persons.

10.2. The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to the implementation of current legislation or in the event that the subject of personal data gives consent to the Operator to transfer data to a third party to fulfill obligations under a civil law contract.

10.3. If inaccuracies in personal data are identified, the Subject may update them independently by sending a notification to the Operator via email address of the Operator **mail@leoni.land** marked "Updating personal data."

10.4. The period for processing personal data is determined by the achievement of the purposes for which the personal data were collected, unless a different period is provided for by the agreement or current legislation. The subject may at any time withdraw his consent to the processing of personal data by sending a notification to the Operator via email to the email address of the Operator **mail@leoni.land** marked "Withdrawal of consent to the processing of personal data."

10.5. All information that is collected by third-party services, including payment systems, communication and other service providers, is stored and processed by these persons (Operators) in accordance with their User Agreement and Privacy Policy. Subject of personal data and/or with specified documents. The Operator is not responsible for the actions of third parties, including the service providers specified in this paragraph.

10.6. Prohibitions established by the subject of personal data on the transfer (except for providing access), as well as on processing or conditions for processing (except for gaining access) of personal data permitted for distribution, do not apply in cases of processing personal data in state, public and other interests determined by law of Qatar.

10.7. When processing personal data, the Operator ensures the confidentiality of personal data.

10.8. The Operator stores personal data in a form that makes it possible to identify the subject of personal data for no longer than required by the purposes of processing personal data, unless the period for storing personal data is established by law, an agreement to which the subject of personal data is a party, beneficiary or guarantor.

10.9. The condition for terminating the processing of personal data may be the achievement of the purposes of processing personal data, the expiration of the consent of the subject of personal data, the withdrawal of consent by the subject of personal data or the requirement to cease the processing of personal data, as well as the identification of illegal processing of personal data.

10.10. Personal data are stored on the Website until the User ceases to use the Website. If data is deleted from the Website at the initiative of one of the parties, the personal data of the User are stored in the databases of the Administration for no more than six months, in accordance with Qatar law.

10.11. Upon expiration of the above-mentioned period of storage of the User's personal data, the User's personal data shall be destroyed. The destruction of personal data is carried out by erasing information using certified software with guaranteed destruction (in accordance with the specified characteristics for the installed software with guaranteed destruction).

11. List of actions performed by the Operator with received personal data

11.1. The operator collects, records, systematizes, accumulates, stores, refines (updates, changes), extracts, uses, transfers (distributes, provides, gives access), depersonalizes, blocks, deletes and destroys personal data.

11.2. The operator performs automated processing of personal data with or without receiving and/or transmitting the received information via information and telecommunication networks.

12. Cross-border transfer of personal data

12.1. Operator does not transfer personal data across borders.

12.2. Cross-border transfer of personal data is possible only with the consent of the user.

13. Confidentiality of personal data

13.1. The Operator and other persons who have access to personal data are obliged not to disclose to third parties or distribute personal data without the consent of the subject of personal data, unless otherwise provided by law.

13.2. Access to Personal Data of Users is possible within the Operator and its employees.

13.3. The Operator will make every reasonable effort to:

- confidential information about users was collected by the Operator only to the minimum required extent;
- confidential information was used exclusively for the purposes stated in its collection;
- confidential information did not fall into third hands, except for the cases stipulated in this Policy or the applicable law.

14. Final provisions

14.1. The Subject may obtain any clarifications regarding the processing of his personal data by contacting the Operator by email to **mail@leoni.land**.

14.2. This document will reflect any changes in the Operator's personal data processing policy. The policy is valid indefinitely until it is replaced with a new version.

14.3. The current version of the Policy is freely available on the Internet at <https://qatar.leoni.land/>.

14.4. The Website may contain links to Websites and other information resources of third parties on the Internet, posted solely for the convenience of Users. Operator does not declare its approval and does not give any assessments of third-party Websites or information contained on these Websites, as well as the possible results of their use, as well as does not check the reliability and relevance of the specified information. The responsibility for the use of third-party Websites lies entirely with the User.

14.5. This Policy applies only to Website services. Operator does not control and is not responsible for the Websites/services of third parties to which the User can click on links available from the Website services, including information about the User processed by third parties.

14.6. If the materials provided by the User contain data, including images, of third parties, including minors, the User guarantees that they have received the necessary permits and consents for their use in accordance with the terms of this Policy.

LLC LEONI INTERNATIONAL FOR TRADE

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Tax Reg No: 5007147960

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EID: 17-2743-04