

## **Privacy Policy for FORTIS DIGITAL SOLUTIONS DMCC website**

This Privacy Policy (Policy) tells you what to expect us to do with your personal information when you attend **FORTIS DIGITAL SOLUTIONS DMCC website** (hereafter, Website).

### **1. Personal data controller details**

1.1. This Website is owned by FORTIS DIGITAL SOLUTIONS DMCC (hereinafter, FORTIS DIGITAL SOLUTIONS DMCC) incorporated: Unit №: 4975 DMCC Business Centre Level № 1 Jewellery & Gemplex 3 Dubai United Arab Emirates. FORTIS DIGITAL SOLUTIONS DMCC defines purposes and measures of data processing regarding this Website and, therefore, acts as data controller.

1.2. The present Policy intends to provide brief and plain explanation relevant solely for the present Website. When you use our particular product or service, provisions of data processing may sufficiently differ and is defined in separate privacy policies or notices as well as corresponding terms and agreements.

1.3. In case we rely on third parties' services to collect and process your personal data (such as cookies and similar technologies, these third parties store your personal data in accordance with their own policies.

1.4. All your queries about your data processing regarding this Website you can address to our DPO (rk@fortis.world). We try to provide you with response timely, as soon as possible, but in any case, within 30 days.

You can find more information about the role of the DPO here from the EDPB (WP29), here from the ICO or here from la CNIL.

### **2. What's your personal data?**

2.1. Generally, your personal data are any data connected to you (art. 2 Convention CE 108, art. 4(1) GDPR).

### **3. Does this Website collect your personal data?**

3.1. This Website itself does not collect personal data, but we use cookies and similar technologies. Third parties provide us with such technologies. These parties collect and process your data in accordance with their own policies.

3.2. More about cookies and similar technologies, their providers and ways in which we use such technologies: Our Cookie (and Similar Technologies) Policy for FORTIS DIGITAL SOLUTIONS DMCC website.

3.3. Another case is where you fill in our contact form in order to discuss your business needs and possible solutions which we offer. In our contact form we ask you to provide us with your full name, company name, contact details (full name, email, phone number, company name) and brief description of your case or your business need or other reason for reaching us out. This information is necessary for us to communicate with you, suggest you proper solution and carry out business negotiation in order to prepare and conclude the contract.

3.4. In a case you send us any queries, we receive your personal data directly from you. In such a case we also can ask you to provide us with some additional information which may be necessary to perform your query. We do not process or store this information longer than it is necessary to perform your request. When the request is completed, we immediately and irrevocably delete all information about you connected to this query.

3.5. We do not collect and process any sensitive personal data or personal data of any special categories, such as genetic or biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation, information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, or criminal convictions or offences.

3.6. We reserve the right to offer you provide us with your consent to receive our advertisement and marketing information (vie email). For this we may offer you check up the box next to the appropriate notice. We are also entitled to inform our current clients about our similar products and services. You can unsubscribe from our mailing list at any time just clicking "unsubscribe" link in the electronic letter.

#### **4. Why do we collect and process personal data?**

4.1. Information mentioned in the para 3.1. of this Policy is necessary for us to:

- enable core functionality of the Website such as security, network management, and accessibility;

- improve our Website by collecting and reporting information on how you use it;

- collect and analyse statistics of visiting our Website and analyse our audience to improve our content and provide you with content you are interested in.

4.2. We process the information listed in the para 3.3. of this Policy for the purposes of taking necessary steps to draft, negotiate and conclude the contract with you.

4.3. Information mentioned in the para 3.4. of this Policy is necessary for us to:

- process your request and response you promptly;

- exercise your rights as data subject properly in accordance with law and in timely manner.

4.4. Information mentioned in the para 3.6. of this Policy is processed in order to inform you about our products and services and offer you proper solutions based on your business needs.

#### **5. What are the legal grounds we rely on processing your personal data?**

5.1. We collect and process information mentioned in the para 3.3. via analytical cookies and similar technologies relying on your prior explicit informed and freely given consent (art. 6(1)(a) GDPR).

5.2. We process your data mentioned in the para 3.3. in order to take steps at the request of the data subject prior to entering into a contract (art. 6(1)(b) GDPR) or our legitimate interest to conclude and perform a contract (art. 6(1)(f) GDPR) – in case if the data subject is not the party of contract (for instance, representative).

5.3 We process information mentioned in the para 3.4. based on the ground of performance of legal duty imposed on us as data controller by applicable law (art. 6(1)(c) GDPR).

5.4. In processing data listed in the para 3.4. we rely on your prior explicit informed and freely given consent (art. 6(1)(a) GDPR) or in the case of existing client, respectively, on our legitimate interest (art. 6(1)(f) GDPR) to inform you about our products and services and offer you proper solutions based on your business needs.

## **6. How long do we store your personal data?**

6.1. Normally, we retain information about you in the form that allow link this information with you as long as it is necessary for the purposes of processing mentioned in the section 4 or to comply with legal obligations imposed on us by applicable law. For instance, we store information about our clients regarding to the contract concluded up to the full performance or termination of the contract and additional term stipulated by law to claim, defend or disprove our legal rights in possible litigation.

6.2. In a case you send us any queries (para 3.4.), we process the information linked to your request no longer than it is necessary to perform your request. When the request is completed, we immediately and irrevocably delete all information about you connected with this query.

6.3. In case we rely on third parties' services to collect and process your personal data these third parties store your personal data in accordance with their own policies.

6.4. In case you consent to our information mailing we store your data for two years or until you withdraw your consent whichever happened earlier (para 3.6.).

## **7. Do we disclose your personal data to third parties?**

7.1. Normally, we do not disclose your personal data to third parties.

7.2. In case we rely on third parties' services to collect and process your personal data these third parties store your personal data in accordance with their own policies.

7.3. We will not share your information with any third parties for the purposes of direct marketing.

7.4. In some circumstances we are legally obliged to share information with state authorities. Normally we can provide authorities only with anonymised statistics because it is technically impossible to find your data in an anonymised aggregated dataset. In any case we share information with state authorities only being sure of lawfulness and validity of the request. We do not execute unlawful requests. We minimise information provided to state authorities and limit it to only strictly prescribed by law degree.

7.5. If we provide links to websites of other organisations, this Privacy Policy does not cover how that organisation processes personal information. We encourage you to read the privacy policies on other websites you visit.

## **8. Do we transfer your personal data abroad?**

8.1. We don't transfer your personal data abroad. All processing takes place in United Arab Emirates. All our servers as well as other equipment and all our staff are located in United Arab Emirates.

## **9. What are your rights?**

9.1. As data subject you have a number of rights under data protection law. The rights available to you depend on our reason for processing your information and applicable law:

9.1.1. Your right to access your data

([art. 15 GDPR](#))

You have the right to ask us for copies of your personal information.

You can read more about this right here from the [ICO](#) and [here](#) from the [EDPB](#).

9.1.2. Your right to rectification your data

([art. 16 GDPR](#))

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

You can read more about this right here from the [ICO](#).

#### 9.1.3. Your right to withdraw consent

([art. 7\(3\) GDPR](#))

You have the right to withdraw your consent to processing your data if such a processing is based on your consent. You can manage your consent any time just clicking “unsubscribe” link in the electronic letter.

You can read more about this right [here](#) from the [EDPB](#).

#### 9.1.4. Your right to erasure (“right to be forgotten”)

([art. 17 GDPR](#))

You have the right to ask us to erase your personal information in certain circumstances, such as, if data are no longer needed for our purposes, or we process your data without any valid legal grounds or anyway unlawfully, or you have withdrawn your consent (if processing was based on your consent), or in other circumstances according to applicable law.

You can read more about this right here from the [ICO](#) and [here](#) from the [EDPB](#).

#### 9.1.5. Your right to restriction of processing

([art. 18 GDPR](#))

You have the right to ask us to restrict the processing of your information in certain circumstances.

You can read more about this right here from the [ICO](#).

#### 9.1.6. Your right to object to processing

([art. 21 GDPR](#))

You have the right to object to processing if we process your information based on our legitimate interests. In the case of mailing list for existing clients you can object to this processing by clicking “unsubscribe” link in the electronic letter.

You can read more about this right here from the [ICO](#).

#### 9.1.7. Your right to data portability

([art. 20 GDPR](#))

This right is unapplicable in the context of this Website.

You can read more about this right here from the [ICO](#) and [here](#) from the [EDPB](#).

9.1.8. Your right not to be subject of automated decision-making, including profiling

([art. 22 GDPR](#))

You have the right not to be subject of automated decision-making, including profiling. We do not pursue automated decision-making, including profiling.

You can read more about this right here from the [ICO](#) and [here](#) from the [EDPB](#).

9.1.9. Your right to lodge a complaint

([art. 77 GDPR](#))

You have the right to lodge a complaint with the supervising authority UAE Data Office [<https://u.ae/en/about-the-uae/digital-uae/data/data-protection-laws>].

9.1.10.

You can address any questions about your rights as data subject to our DPO ([rk@fortis.world](mailto:rk@fortis.world)). We try to provide you with response timely, as soon as possible, but in any case, within 30 days.