

1 Introduction

- 1.1 Gulf Learning is an Consultant Events company. We help clients accelerate sales, networking for sustainability in various markets in developing countries. Through research, advisory and implementation services, we build the best platform, support their growth in developing markets and scale innovations to grow profit and impact.
- 1.2 We are committed to safeguarding the privacy of our website visitors and Gulf Learning newsletter subscribers.
- 1.3 This policy applies where we are acting as a data controller with respect to the personal data of website visitors and Gulf Learning newsletter subscribers; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.4 We use cookies on our website for the provision of our website and services, as well as for analytics purposes to help us improve our product offering.
- 1.5 In this policy, "we", "us" and "our" refer to Gulf Learning and its subsidiaries.

2 How we use your personal data

- 2.1 In this Section 2 we have set out:
 - (a) the general categories of personal data that we may process;
 - (b) the purposes for which we may process personal data; and
 - (c) the legal bases of the processing.
- 2.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.
- 2.3 We may process your personal data ("**personal data**"). The personal data may include your name and email address. The source of the personal data is the data provided by you. The personal data may be processed for the purposes of operating our website, the Gulf Learning Community, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and service.
- 2.4 We may process information contained in any inquiry you submit to us regarding services ("**inquiry data**"). The inquiry data may be processed for the purposes of offering, marketing and selling relevant services to you. The legal basis for this processing is consent OR your directly communicated interest in the relevant services.
- 2.5 We may process information relating to our customer relationships, including customer contact information ("**customer relationship data**"). The customer relationship data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer. The source of the customer relationship data is you. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our products and services to customers. The legal basis for this processing is consent OR our legitimate interests, namely the proper management of our customer relationships.

- 2.6 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is the performance of a contract between you and us.
- 2.7 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our business and communications with users.
- 2.8 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 2.9 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 2.10 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

3 Providing your personal data to others

- 3.1 Your personal details will be used solely for internal informational purposes by Gulf Learning, and will not be given, sold or otherwise redistributed to third parties for commercial purposes.

4 International transfers of your personal data

- 4.1 In this Section 4, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
- 4.2 We have operations in Middle East, Europe and Asia. Transfers to India will be protected by appropriate safeguards, namely the use of standard data protection clauses, which may be obtained by contacting us at info@GulfLearning.com
- 4.3 We employ a number of third party data processors (listed in Section 4.4) situated in the United States. Transfers to these processors will be protected by appropriate safeguards, namely the use of standard data protection clauses and/or the EU - U.S. Privacy Shield. We will take reasonable and appropriate steps necessary to ensure that all third parties engaged as sub-processors are processing the personal information we entrust to them in a manner that is consistent with the requirements of the GDPR.
- 4.4 Third party processors:

Processor Name	Processing Activities	Data Location(s)
Google, Inc.	Cloud Service Provider	EU
Insightly	CRM	US
GoDaddy	Web Server	EU

5 Retaining and deleting personal data

- 5.1 We will retain your personal data for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. After this data is no longer necessary, we will delete or anonymize data in our possession within a reasonable time frame, except such data as we determine may be needed to resolve disputes, enforce agreements, and comply with business, technical, or legal requirements related to the Gulf Learning website.

6 Amendments

- 6.1 We may update this policy from time to time by publishing a new version on our website.
- 6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 6.3 We will notify you of significant changes to this policy by email.

7 Your rights

- 7.1 In this Section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 7.2 Your principal rights under data protection law are:
 - (a) the right to access;
 - (b) the right to rectification;
 - (c) the right to erasure;
 - (d) the right to restrict processing;
 - (e) the right to object to processing;
 - (f) the right to data portability;
 - (g) the right to complain to a supervisory authority; and
 - (h) the right to withdraw consent.
- 7.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data.
- 7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
- 7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal

claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

- 7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 7.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 7.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 7.10 To the extent that the legal basis for our processing of your personal data is by consent only.
- 7.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement. The contact information of our office may be found in Section 12.
- 7.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 7.13 You may exercise any of your rights in relation to your personal data by written notice to us.

8 About cookies

- 8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 8.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

9 Cookies that we use

- 9.1 We use cookies to:
 - a) recognize your browser and user session
 - b) keep track of what pages you have visited
 - c) store your user preferences
 - d) perform analytics to help us make our service better, and to
 - e) assist with administration and security for our website and software

10 Cookies used by third-parties

- 10.1 Throughout our website we have integrated social media share buttons from third party websites such as

Facebook and Twitter. Pages with this embedded content may present cookies from these websites over which Gulf Learning assumes no control.

- 10.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

11 Managing cookies

- 11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- e) <https://support.apple.com/kb/PH21411> (Safari); and
- f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

- 11.2 Blocking all cookies will have a negative impact upon the usability of many websites.

- 11.3 If you block cookies, you will not be able to use all the features on our website.

12 Our details

- 12.1 This website is owned and operated by Gulf Learning FZE.

- 12.2 Our registered address is 3rd Floor, UAQFTZ, Al Shmookh Business Center, Umm Al Quwain, **United Arab Emirates**

- 12.3 You can contact us:

- (a) using our website contact form: <http://www.gulflearning.com/contact-us/>
- (b) by email, at info@gulflearning.com

- 12.4 Your privacy is very important to us. Should you have any questions or concerns about our privacy policies, please send us an email to info@gulflearning.com. This Privacy Policy is accessible from on the Gulf Learning website. You can print and save it at any time.

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