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7.0 PRIVACY POLICY

7.1 INTRODUCTION

East & West Property Development (“EWPD, Company,” “we,” “us,” or “our”) is a real estate company providing property sales, leasing, property management, valuation, brokerage, advisory, and related services.

Our principal place of business is at:

**Office #2101 (21st Floor),
Westburry Commercial Tower
Al Abraj Street,
Business Bay, Dubai
United Arab Emirates.**

Contact: privacy@ewp.ae

Phone: +971 4 245 6699

We are committed to protect the privacy and security of our stakeholders personal information. This Privacy Policy outlines how we collect, use, store, and protect stakeholder data in compliance with UAE Federal Decree-Law No. 45 of 2021 on Personal Data Protection, Abu Dhabi data protection regulations, and international privacy standards & ADGM or DIFC data protection laws where relevant.

By using our website (www.ewp.ae) and services, you expressly consent to the terms outlined in this Privacy Policy.

We process stakeholder’s personal data in accordance with applicable laws, legal, regulatory & other requirements.

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7.2 SCOPE

This Policy applies to personal data processed when you:

- Visit our website, mobile apps, or digital platforms.
- Enquire about, view, buy, sell, lease, or manage properties through us.
- Interact via listings portals, social media, email, or phone.
- Attend in-person viewings, events, or visit our offices where CCTV operates.
- Apply for employment.
- Work with us as a vendor/partner.

7.3 WHAT PERSONAL DATA WE COLLECT

We generally do not collect sensitive data (e.g., health data) unless required for a specific purpose and lawfully justified (e.g., accessibility accommodations for viewings). We do not store sensitive financial data such as credit card numbers, CVV codes, or banking details. All financial transactions are securely processed through a UAE Central Bank-verified payment gateway that maintains compliance with Payment Card Industry (PCI) data security standard (DSS).

Where collected, we will apply enhanced safeguards and legal bases. However, we may collect the following information:

- **Identity & Contact**
 - ✓ Name
 - ✓ Title
 - ✓ Date of birth
 - ✓ Nationality
 - ✓ Passport (for KYC compliance)
 - ✓ Emirates ID
 - ✓ Visa & Residency status
 - ✓ Email
 - ✓ Phone
 - ✓ Address

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- **Property & Transaction**

- ✓ Property preferences
- ✓ Budget
- ✓ Location
- ✓ Tenancy history
- ✓ Ownership records
- ✓ Offers
- ✓ Agreements
- ✓ Tenancy contracts
- ✓ Sales
- ✓ MOU
- ✓ Deeds and titles
- ✓ Viewings history and feedback

- **Financial & AML / KYC**

- ✓ Payment details (tokenized—no full card details stored).
- ✓ Bank info (for rent/owner payouts)
- ✓ Proof of funds
- ✓ Source of wealth
- ✓ Compliance screenings
- ✓ Required under AML / CFT laws.

- **Professional**

- ✓ Employer
- ✓ Job title
- ✓ Trade license (for corporate clients)
- ✓ Power of attorney where applicable

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- **Technical & Usage**

- ✓ IP address
- ✓ Device IDs
- ✓ Browser type and operating system
- ✓ Cookies
- ✓ Analytics data
- ✓ Interactions with our Sites & emails
- ✓ Media & Security
- ✓ CCTV footage at our premises.
- ✓ Call recordings (where applicable and notified)
- ✓ Recruitment (if you apply for a job)
- ✓ CV/resume, qualifications, references, right-to-work checks
- ✓ Special Category / Sensitive Data

- **Communication Data**

- ✓ Correspondence with our team
- ✓ Inquiries and feedback
- ✓ Marketing preferences

7.4 HOW WE COLLECT DATA

- Directly from Stakeholders (forms, calls, WhatsApp, emails, viewings, contracts, events).
- From third parties (listings portals, referring agents, banks, payment processors, landlords/sellers, property managers, public records, KYC/AML providers).
- Automatically via cookies, SDKs, and analytics on our Sites/apps.

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7.5 WHY WE USE STAKEHOLDER DATA (PURPOSES) & LEGAL BASES

We process stakeholder data for:

SL NO	PURPOSE	LEGAL REQUIREMENTS
1	<p>Service Delivery</p> <ul style="list-style-type: none"> Respond to enquiries Arrange viewings Manage listings Negotiate Draft & execute MOUs / tenancy agreements Manage property handovers Schedule maintenance 	<p>Legal Bases</p> <ul style="list-style-type: none"> Contract performance. Legitimate interests. Compliance with law.
2	<p>Property Management</p> <ul style="list-style-type: none"> Rent collection Repairs Maintenance coordination Inspections, Deposit handling Owner reporting 	<p>Legal Bases</p> <ul style="list-style-type: none"> Contract performance. Legitimate interests.
3	<p>Compliance & Risk</p> <ul style="list-style-type: none"> KYC/AML checks Sanctions screening Fraud prevention Tax Audits Responding to lawful requests from authorities. 	<p>Legal Bases</p> <ul style="list-style-type: none"> Legal obligation substantial public interest (where applicable).

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SL NO	PURPOSE	LEGAL REQUIREMENTS
4	<p>Payments & Invoicing</p> <ul style="list-style-type: none"> Process payments and refunds, issue statements. 	<p>Legal Bases</p> <ul style="list-style-type: none"> Contract performance. legal obligation.
5	<p>Marketing & Communications</p> <ul style="list-style-type: none"> Send property alerts Market updates Newsletters Event invites Satisfaction surveys 	<p>Legal Bases</p> <ul style="list-style-type: none"> Consent (where required) legitimate interests (with opt-out).
6	<p>Analytics & Improvement</p> <ul style="list-style-type: none"> Website performance User experience Service development Training Quality assurance (including call recordings where notified). 	<p>Legal Bases</p> <ul style="list-style-type: none"> Legitimate interests Consent for non-essential cookies
7	<p>Security</p> <ul style="list-style-type: none"> CCTV monitoring access controls incident response. 	<p>Legal Bases</p> <ul style="list-style-type: none"> Legitimate interests. legal obligation.
8	<p>Recruitment</p> <ul style="list-style-type: none"> Evaluate candidates Conduct interviews Background checks (where lawful). 	<p>Legal Bases</p> <ul style="list-style-type: none"> Contract performance (pre-contractual steps). Legitimate interests. Consent where required.

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7.6 HOW WE USE STAKEHOLDER’S INFORMATION

We use stakeholder’s data for the following specific purposes:

- **Real Estate Services**
 - ✓ Facilitating property transactions, reservations, and registrations.
 - ✓ Processing payments and managing escrow requirements.
 - ✓ Providing property management services.

- **Communication & Support**
 - ✓ Responding to inquiries and service requests.
 - ✓ Providing updates on property status.
 - ✓ Sending transaction confirmations and receipts.

- **Marketing & Promotional Activities**
 - ✓ Sending property updates and investment opportunities.
 - ✓ Sharing company news and developments.
 - ✓ Providing personalized property recommendations.

Note:

All marketing communications include an option to unsubscribe

- **Legal & Compliance:**
 - ✓ Conducting KYC verification as required by UAE regulations.
 - ✓ Complying with legal obligations under UAE real estate laws.
 - ✓ Maintaining proper business records.

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7.7 SHARING STAKEHOLDER’S DATA

We may share appropriate personal data with:

- Buyers, sellers, landlords, tenants, guarantors, and their representatives to progress transactions.
- Listings portals CRM providers, email / SMS platforms.
- Property managers, maintenance vendors, inspectors, valuers.
- KYC/AML providers, payment processors, banks.
- Professional advisors (legal, audit, tax), insurers.
- Government/regulatory authorities, courts, law enforcement where required.
- Affiliates/group companies (intra-group processing).
- Prospective purchasers of our business (due diligence), under confidentiality.
- We require processors to implement appropriate security measures and process data only under our instructions.

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7.8 INTERNATIONAL DATA TRANSFERS

EWPD primarily stores and processes data within the UAE. In the event data must be transferred outside the UAE, we ensure:

- The recipient country has adequate data protection laws.
- Appropriate safeguards are implemented through contractual provisions.
- The transfer complies with UAE data protection requirements.

Where we transfer personal data outside stakeholder’s jurisdiction (e.g., to cloud platforms or group entities), we implement appropriate safeguards such as:

- Adequacy decisions (where available).
- Standard Contractual Clauses (SCCs) or equivalent legal instruments.
- Intra-group agreements with technical and organizational measures
Details of transfer safeguards are available upon request.

7.9 DATA STORAGE & SECURITY MEASURES

We use appropriate **technical and organizational measures** to protect personal data, including encryption (in transit/at rest where applicable), access controls, network security, staff training, and vendor due diligence. Despite safeguards, no system is 100% secure—please exercise care when sharing information online. EWPD implements comprehensive security measures to protect stakeholder data:

- Encryption: SSL/TLS encryption for all data transmission.
- Access Controls: Role-based access restrictions with multi-factor authentication.
- Regular Security Audits: Periodic vulnerability assessments and penetration testing.
- Employee Training: Regular data protection training for all staff.

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- Data Minimization: We collect only what is necessary for business operations.
- Secure Hosting: Protected servers with industry-standard firewall protection.

We retain personal information only as long as necessary for the purposes outlined in this policy or as required by UAE law, which is typically 5-7 years for real estate transaction records.

7.10 DATA SHARING & THIRD-PARTY SERVICES

We may share stakeholder’s personal information with the following categories of recipients:

- Government Authorities: Abu Dhabi Real Estate Centre (ADREC), Department of Municipalities and Transport, and other relevant regulatory bodies as required by law.
- Service Providers: Legal advisors, escrow services, property registration authorities, and other entities essential for completing real estate transactions
- Financial Institutions: Banks and payment processors (for transaction processing only).
- IT Service Providers: Data hosting and security services operating under strict confidentiality agreements

We do not sell, rent, or otherwise disclose personal information to third parties for marketing purposes.

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7.11 COOKIES & TRACKING TECHNOLOGIES

Our website uses cookies and similar technologies to enhance user's browsing experience and provide certain website functionality. These technologies help us:

- Understand user navigation patterns and preferences.
- Remember user login status and language preferences.
- Deliver personalized content based on stakeholder's interests.
- Analyze website performance and usage statistics.

Website users can manage or disable cookies through the browser settings at any time. However, disabling certain cookies may affect website functionality.

7.12 STAKEHOLDER PRIVACY RIGHTS

Under UAE data protection laws, stakeholders have the following rights regarding their personal data:

- Right to Access: Request confirmation of whether we process stakeholder's data and receive a copy of the personal data we hold.
- Right to Rectification: Request correction of inaccurate data or completion of incomplete data.
- Right to Erasure: Request deletion of personal data under certain circumstances.
- Right to Restrict Processing: Request restriction of processing in specific scenarios.
- Right to Data Portability: Receive personal data in a structured, commonly used format.
- Right to Object: Object to processing based on legitimate interests or for direct marketing.

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- Right to Withdraw Consent: Withdraw previously given consent at any time.
- Lodge a complaint with Supervisory Authority.

For any information regarding the above rights, please contact us at info@ewp.ae.

7.13 CHILDREN’S PRIVACY

Our services are not directed to individuals under the age of 18. We do not knowingly collect personal information from children. If we become aware that we have inadvertently collected personal data from a child, we will take steps to delete it as soon as possible.

7.14 CHANGES TO THE PRIVACY POLICY

We may update this Policy from time to time. We will post the latest version with the “Last Updated” date and, where material changes occur, notify the stakeholder through reasonable channels. EWPD reserves the right to update this Privacy Policy as necessary to reflect changes in our practices or legal requirements. Any significant changes will be communicated through:

- Prominent notice on our website.
- Email notification to registered users
- Updated “Last Modified” date at the top of this policy.

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7.15 CONTACT INFORMATION

For any questions or concerns regarding this Privacy Policy or our data practices, please contact our Data Protection Officer:

Contact: privacy@ewp.ae , Phone: +971 4 245 6699

Office #2101 (21st Floor),

Westburry Commercial Tower.

Al Abraj Street,

Business Bay, Dubai

United Arab Emirates.

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7.16 REAL ESTATE–SPECIFIC DISCLOSURES

- **Viewings & Access:** Names, contact details, viewing times, and ID verification may be required for security and community regulations.
- **Photographs/Virtual Tours:** Listings may include photos, videos, or 3D tours. We avoid displaying unrelated personal possessions. You may request redaction where reasonable.
- **RERA / Local Regulatory Compliance:** Where applicable, we comply with relevant requirements of real estate regulator (e.g., permits, forms, disclosures).
- **Tenancy & Owners Associations:** We may share necessary data with building / community management for move-ins, access cards, and compliance.

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7.17 THIRD-PARTY LINKS & PLATFORMS

Our Sites and listings may link to third-party websites or platforms we do not control (e.g., portals, payment gateways, map services, social media).

Their privacy practices govern stakeholder’s use of those services. All should review their policies before sharing data.

7.18 AUTOMATED DECISION-MAKING / PROFILING

We do not make decisions producing legal or similarly significant effects solely by automated means. We may use limited profiling for property matching and marketing segmentation. You can object to such profiling for direct marketing at any time.

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