

Privacy Notice

Data Management Office

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Walaa Cooperative Insurance

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1.0 Document Information

1.1 Document Details

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Document Approver	Johnson Varughese
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1.2 Approvals

This document is approved by the above-mentioned Document Approver. The Document Owner retains the evidence of approval.

1.3 Disclosure

This document is subject to regulators' updates, such as circular or regulation, which will be considered as a part of this document.

1.4 Document Copyright and Accessibility

The copyright of this document is the property of Walaa Cooperative Insurance Co. This document is published on the condition that it may not be reproduced, distributed, or disclosed to any third party in any form without the prior written authorization of the copyright owner, or unless if it is classified as a public document.

The concerned Walaa staff shall have access to electronically displayed "Read Only" versions of this document under the concerned department's folder which is on Walaa's file servers placed under the DMS (Document Management System) folder ([\\Walaafs\DMS](#)).

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1.5 Version History

The version history table below provides a record of all revisions made to this document throughout its life cycle. Updates are tracked by the version number, date the revisions were made, a brief description of the changes made and reason, as well as the name of the reviser and the approver.

Ver. #	Ver. Date	Change Description/ Reason	Created / Revised by	Approved by
0.1	2024.09.18	Initial version	Keypoint	N/A
1.0	2024.09.18	Final version	Keypoint	Johnson Varughese

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2.0 Privacy Notice

Walaa respects your right to data privacy. In this Notice “You” or “Your” refers to data subjects (customers, employees, website visitors, or contingent workers) whose personal data is processed by Walaa.

Our company is committed to safeguarding your personal data and ensuring its confidentiality, integrity, and security. We implement stringent security measures to protect your information from unauthorised access, disclosure, or misuse. As part of our ongoing efforts, all employees receive regular training on personal data privacy, best practices for data protection, and how to securely handle and manage personal information in compliance with applicable data protection laws and regulations.

This privacy notice explains who we are, how we collect, share, and use personal data about you, and how you can exercise your data privacy rights. The details on what personal data will be processed and which method will be used depend significantly on the services applied for or agreed upon.

This Privacy Notice is governed by the applicable data protection laws of the Kingdom. Our company adheres to these laws, ensuring that any processing of personal data related to individuals residing in the Kingdom, regardless of where the processing occurs, complies with legal requirements. This includes the protection of personal data that may lead to the identification of the individual or their family members, including posthumous data. However, personal data processed for purely personal or family use, not disclosed to others, is excluded from the scope of this law.

2.1 Definitions

2.1.1 Consent

Consent of the data subject means any freely given, specific, informed, and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by clear affirmative action, signifies agreement to the processing of personal/sensitive personal data relating to him or her.

2.1.2 Data Protection Officer (DPO)

A person who, either alone or jointly with other persons, determines the purposes and means of processing any personal data; except where the purposes and means of the processing of personal data are determined by law, the person entrusted with the processing obligation is deemed for the purposes of this Law to be the Data Controller.

2.1.3 Data Subject

The natural person, legal person, or individual subject of data.

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2.1.4 Personal Data

Any information relating to a data subject who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that data subject. This may also include photographs and/or video footage taken during events or for a specific purpose.

2.1.5 Sensitive Personal Data

Data that reveals your racial or ethnic origin, religious, political, or philosophical beliefs, or trade union membership; genetic data; biometric data for the purposes of unique identification; or data concerning your health.

2.1.6 Processing

Processing is any operation or set of operations which is performed on personal/sensitive personal data or sets of personal/sensitive personal data, whether by automated means, such as collection, recording, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

2.1.7 Data Processor

A person, other than an employee of the data controller or data processor, who processes personal/sensitive personal data for the data controller's benefit and on the data controller's behalf.

2.1.8 Third Party

Any person other than:

- ◆ Data subject.
- ◆ Data protection officer
- ◆ A data processor
- ◆ Data controller
- ◆ Any person, under the direct authority of the data controller or data processor, authorised to process data for the benefit of the data controller or data processor.

2.1.9 Contingent Workers

Contingent workers mean non-permanent workers including agents, consultants, independent contractors, sub-contractors, temporary workers, professional advisors, interns, trainees, and those affiliated with third parties.

2.1.10 Joint Controller

Where two or more controllers jointly determine the purposes and means of processing, they shall be joint controllers.

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2.1.11 Group Entity (Group)

Includes a holding Entity, subsidiary, associate Entity (including a joint venture Entity), and a subsidiary of a holding Entity to which the Entity is also a subsidiary.

2.1.12 Direct Marketing

Communication, by whatever means, of any marketing material or advertisement which is directed to a person.

2.1.13 Authority

Personal Data Protection Authority established by the Personal Data Protection Law and Insurance Authority, Saudi Arabia.

If you have any questions or concerns about our processing of your personal data, then please contact us at dp.officer@walaa.com

2.2 When do we collect your personal data?

We primarily collect personal data directly from you for the purposes specified at the time of collection. However, in certain situations, we may collect personal data from other sources or for different purposes, including:

- ◆ With your explicit consent.
- ◆ When the data is publicly available or obtained from a publicly accessible source.
- ◆ If required for public interest or security purposes, or to comply with legal or judicial obligations.
- ◆ If necessary to protect your vital interests or prevent harm.
- ◆ For public health and safety, or to protect the life or health of individuals.
- ◆ When the data is processed in a way that does not identify you.
- ◆ When it is necessary to protect our legitimate interests, provided that your rights and interests are not compromised, and no sensitive data is processed.

2.3 Direct interactions

You may give us your identity, contact, resume, or KYC-related information by filling in forms or by corresponding with us by phone SMS, email, or otherwise:

- ◆ Records of your interactions with us such as emails and other correspondence and your instructions to us.
- ◆ Providing your feedback.
- ◆ By filling in forms, for example, to download white papers and/or gather insights on case studies.
- ◆ By sharing your personal data such as your resume for recruitment purposes.
- ◆ By interacting with us on social media platforms such as Facebook, Instagram, LinkedIn, etc.
- ◆ Ordering information regarding our products or services.
- ◆ Subscribing to our services, publications, or newsletters.
- ◆ Request marketing material notifications to be sent to you.

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- ◆ By sending us emails and text messages (SMS or WhatsApp or Chat Service).
- ◆ By adding posts, reviews, and other comments to our website; and
- ◆ By liking or disliking our offers and promotions.

2.4 Automated technologies or interactions

2.4.1 Direct Log Files

Log information is data about your use of the Service, such as IP (Internet Protocol) address, browser type, referring/exit pages, operating system, date/time stamps, and related data, which is stored in log files.

2.4.2 Cookies

A cookie is a small data file transferred to your computer (or other devices) when it is used to access our service. Cookies may be used for many purposes, including to enable certain features of our service and remember your preferences, your equipment, browsing actions, and patterns, to better understand how you interact with our service, to provide you advertising on and off the service, and to monitor usage by visitors and online traffic routing. You may be able to instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the online services you visit. If you do not accept cookies, however, you may not be able to use all portions of our Service or all functionality of our Service.

Please see our cookie policy for further details.

2.5 Third parties or publicly available sources

We may receive aggregated personal data about you from various third parties, via public domains such as:

- ◆ Technical Data from the following parties:
- ◆ Analytics providers such as Google, Facebook, etc.
- ◆ Social media platforms such as Facebook, X, Instagram, LinkedIn, etc.
- ◆ Personal data gathered from publicly available directories/ registers are processed fairly, and lawfully with an adequate level of security and are not excessive concerning the purpose for which they are collected.

2.6 Data Collection from Minors

If you are a resident of Saudi Arabia and under 18, or if you reside elsewhere and are not yet of legal age in your jurisdiction, we are not permitted to contract with you directly. If required by local legislation, your guardian must acknowledge and consent to the terms of this Privacy Notice on your behalf. Should we need to obtain your consent for processing your personal data for specific purposes, such consent must be provided by your guardian.

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2.7 What personal data do we collect?

We may collect, store, and use the following categories of personal data about you:

2.7.1 Identity Data

- ◆ First name
- ◆ Last name
- ◆ Username
- ◆ National ID
- ◆ Date of Birth
- ◆ Home Address
- ◆ Phone Numbers
- ◆ Passport Number
- ◆ Gender
- ◆ Iqama ID details
- ◆ Driving license
- ◆ Photographs
- ◆ Occupation details

2.7.2 Financial Data

- ◆ Bank account number (IBAN #)
- ◆ Name as per bank account
- ◆ Credit card Number

2.7.3 Contact Data

- ◆ Email address
- ◆ Telephone numbers/contact number
- ◆ Billing address
- ◆ Shipping/delivery address

2.7.4 Transaction Data

Details about payments to and from you and other details of products and services you have purchased from us. These include:

- ◆ Any relevant billing and delivery addresses.

2.7.5 Technical Data

- ◆ Internet protocol (IP) address
- ◆ We also track how often you visit and use our website. We do this via email and website cookies and similar tracking technology built into our website.
- ◆ Biometric Data

Please see our cookie policy for further details.

2.7.6 Profile Data

- ◆ Your interests, preferences, feedback, and survey responses.

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- ◆ Profile image; and
- ◆ About you (mentioned in resume including qualifications).
- ◆ Usernames and passwords to access the insurance portal.

2.7.7 Usage Data

- ◆ Information about how you use our website, products, and services; and
- ◆ For information on what you view, click on access by way of our emails and text messages, website and mobile.

2.7.8 Marketing and Communications Data

We may ask you to leave a review or take a survey to provide you better services. We may also collect your personal data for responding to your queries and comments, social media posts, and questions/ queries. If you would like to opt-out/unsubscribe from marketing or promotional communications from Walaa, you can do so by reaching out to our Data Protection Officer at dp.officer@walaa.com

2.7.9 Aggregated Data (sometimes referred to as pseudonymised data)


Walaa also collects, uses, and shares aggregated data (sometimes referred to as pseudonymised data) such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in the applicable law(s) as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this data privacy notice.

2.7.10 Sensitive Personal Data or Special Category of Personal Data

Walaa does not collect, store, and use the following “special categories” of sensitive personal data regarding you such as:

- ◆ Information about your race or ethnicity, religious beliefs, and sexual orientation.
- ◆ Information about your health, including any medical condition, health and sickness records, medical records, and health professional information.
- ◆ Any criminal records information in relation to you, and
- ◆ Biometric information about you, for example, fingerprints, and retina scans.

Our intent is not to collect or process any sensitive personal data about you unless required by applicable laws. And it is only collected after obtaining explicit consent from you. However, in certain circumstances, we may need to collect, or request your special category of personal data for employment-related purposes via resume shared, for example, data

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regarding your hobbies and preferences, gender, and disabilities for the purposes of equal opportunities monitoring, to comply with anti-discrimination laws and for government reporting obligations.

2.8 How and why do we use your personal data?

We will only use your personal data when the law allows us to. We will use your personal data in the following circumstances:

- ◆ The processing is necessary for reasons of substantial public interest, or for official purposes or requested for or by the police or governmental authorities on a lawful basis.
- ◆ It is necessary for the establishment, exercise, or defense of legal claims, for the purposes of carrying out the obligations and exercising our or your rights in the field of
- ◆ Employment, social security, and social protection law; or
- ◆ Based on your explicit consent.
- ◆ Where we need to perform the contract, we have entered with you.
- ◆ Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- ◆ Where processing is necessary in order to protect the vital interests of the data subject or of another natural person.

2.8.1 Legitimate Interest

- ◆ Means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience.
- ◆ We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests.
- ◆ We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by-laws); and
- ◆ We may also use your personal data in the following situations, which are likely to be rare:
 - ◆ Where we need to protect your interests (or someone else's interests).
 - ◆ Where it is needed in the public interest or for official purposes.

2.8.2 Purpose/ activity, type of data, and lawful basis for processing

Walaa has set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal base(s) we rely on to do so. Walaa has also identified what our legitimate interests are, where appropriate.

Note that Walaa may process your personal data for more than one lawful ground depending on the specific purpose for which Walaa is using your data.

However, Walaa normally collects personal data from you only where Walaa has your consent to do so, where Walaa needs the personal data to perform a contract with you, or where the processing is in the legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In certain cases, Walaa may also have legal obligations

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to collect personal data from you or may otherwise need the personal data to protect your vital interests or those of another data subject.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

If Walaa requests any personal data not mentioned in this notice, we will clearly explain the type of data being requested and the purpose for collecting it at the time of collection.

However, Walaa may also use your personal data for other purposes such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes where they are permitted by applicable laws.

2.8.3 Promotional offers from Walaa

If you have explicitly consented to receive marketing information from Walaa, Walaa may use your identity, contact, technical, usage, and profile data to form a view on what Walaa thinks you may want or need, or what may be of interest to you. This is how Walaa decides which products, services, and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for an event/ promotion and, have not withdrawn your consent to receiving such information.

2.8.4 Third-party marketing

Walaa shall get your explicit consent for sharing your personal data for any marketing activities carried out by our third-party service providers. In such case, we shall provide you with an option to withdraw your consent from receiving such marketing promotions from our third-party service providers.

2.8.5 Request to withdraw consent

At any point, if you wish to withdraw your consent to receive marketing/ promotional information from Walaa, you can write an email to our Data Protection Officer (DPO) at dp.officer@walaa.com

Kindly note that this does not apply to personal data provided to us because of a product/ service subscription/ purchase, product/ service experience, or other transactions.

2.8.6 Change of purpose

We will only use your personal data for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to process your personal data for a purpose other than the one for which it was originally collected, we will first obtain your consent, unless an exception under the law applies. You have the right to withdraw your consent at any time, as governed by the applicable regulations.

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If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the contact details provided.

Processing Without Consent

In certain circumstances, we may process your personal data without your explicit consent:

- ◆ If processing serves your actual interests but communicating with you is impractical or impossible.
- ◆ If processing is required by law or to fulfill an agreement to which you are a party.
- ◆ If processing is necessary for security purposes or to meet judicial requirements.
- ◆ If processing is necessary for our legitimate interests, provided it does not infringe on your rights and interests and does not involve sensitive data.

2.8.7 Disclosure of Personal Data

- ◆ We will not disclose your personal data except in the following situations:
- ◆ If you have consented to the disclosure in accordance with applicable laws.
- ◆ If the data has been collected from a publicly available source.
- ◆ If the disclosure is requested by a public entity for public interest or security purposes, or to comply with another law or judicial requirements.
- ◆ If the disclosure is necessary to protect public health, safety, or the lives or health of specific individuals.
- ◆ If the disclosure involves subsequent processing in a manner that makes it impossible to identify you directly or indirectly.
- ◆ If the disclosure is essential for achieving our legitimate interests, provided it does not infringe on your rights and interests and does not involve sensitive data.

However, we will not disclose your personal data if such disclosure:

- ◆ Threatens security, harms the reputation of the Kingdom, or conflicts with the Kingdom's interests.
- ◆ Affects the Kingdom's relations with other states.
- ◆ Impedes crime detection, affects the rights of an accused to a fair trial, or impacts the integrity of criminal procedures.
- ◆ Compromises individual safety.
- ◆ Violates the privacy of individuals other than you, as set out in applicable regulations.
- ◆ Conflicts with the interests of individuals who lack legal capacity.
- ◆ Breaches professional obligations or judicial decisions.
- ◆ Exposes confidential sources in a manner harmful to the public interest.

2.9 Who do we share your personal data with?

On occasion, we may have to share your personal data with the parties set out below for the purposes set out.

2.9.1 Group Entities/ Subsidiaries

Walaa shall share your personal information with our parent/ group Entity/ entities for reporting purposes, having similar arrangements, to be able to provide you with the same value

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for money and high-quality experience for the services provided to you by us. It's also the only way we can provide you with the best benefits.

2.9.2 External Third Parties

- ◆ Regulators and other authorities: acting as processors or joint controllers based in the Kingdom of Saudi Arabia who require reporting of processing activities in certain circumstances.
- ◆ With social media companies such as Facebook, Twitter, LinkedIn, and others: they run promotions for us on their platforms.
- ◆ Any new business partners: we may have over time, for example, in the event of a joint venture, reorganization, business merger, or sale that affects us.
- ◆ We may share your personal data with the police, local authorities, courts, or other government authorities if legally required. Additionally, we may share your data with government electronic systems and software, such as the NPHIES platform, which provides a unified health record system to ensure compliance with privacy and confidentiality regulations.
- ◆ Other people who make a 'data subject access request': where we are required to do so by law.
- ◆ We may use your personal data to investigate fraudulent claims or applications made by insurance policyholders, including cases of large-scale or organized fraud, medical malpractice, and to conduct Anti-Money Laundering (AML) checks.
- ◆ We may also share the information we collect where we are legally obliged to do so, e.g., to comply with a court order.
- ◆ Any social media posts or comments you send to us: (on Walaa's Facebook page, for instance) will be shared under the terms of the relevant social media platform (e.g., Facebook, X, LinkedIn, or other) on which they are written, and could be made public. Other people, not Walaa, control these platforms. Walaa is not responsible for this kind of sharing. Before you make any remarks or observations about anything, you should review the terms and conditions and privacy policies of the social media platforms you use. That way, you will understand how they will use your information, what information relating to you they will place in the public domain, and how you can stop them from doing so if you are unsatisfied about it. It is worth remembering that any blog, review, or other posts or comments you make about us and/or our products and services on any of our blogs, reviews, or user community services will be shared with all other members of that service and the public at large. You should take extra care to ensure that any comments you make on these services, and on social media in general are fit to be read by the public, and are not offensive, insulting, or defamatory. Ultimately, you are responsible for ensuring that any comments you make comply with any relevant policy on acceptable use of those services.
- ◆ Third parties/ Data Processors: To whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change occurs in our business, we will notify you, and the new owners may use your personal data in accordance with the terms outlined in this privacy notice. We require all third parties to respect the security of your personal data and to

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treat it in accordance with the law. We do not allow our third-party service providers/ data processors to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions/third-party agreements.

2.9.3 International Transfers

Walaa may share your personal data within the Parent/ Group Entity on a need-to-know basis with the confidential obligation mentioned herein.

Some of our external third parties are based outside the Kingdom of Saudi Arabia so their processing of your personal data will involve a transfer of data outside the Kingdom. Whenever we transfer your personal data out of the Kingdom, including cloud hosting, backup systems, or data recovery sites, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Subject to prior approval from the Authority; or
- With your consent; or

Please contact us if you want further information on how we transfer your personal data out of the Kingdom.

2.10 How do we protect your personal data?

Walaa uses appropriate technical and organizational measures to protect the personal data that we collect and process. The measures Walaa uses are designed to provide a level of security appropriate to the risk of processing your personal data.

A lot of the information we receive reaches us electronically, originating from your devices, and is then transmitted by your relevant telecoms network provider. Where it's within our control, we put measures in place to ensure this 'in flight' data is as secure as it possibly can be.

Sensitive data like, passwords are protected for data in transit by data encryption. In addition to encryption, we have implemented robust network security controls to help protect data in transit. Network security solutions like firewalls and/or network access control to secure the networks used to transmit data against malware attacks or intrusions.

We do not permit the copying of official documents that identify Data Subjects, except where required by law or if a competent public authority requests such copying in accordance with applicable regulations.

Walaa uses secure means to communicate with you where appropriate, such as 'https' and other security and encryption protocols.

2.11 How long will we keep your personal data?

We will retain your personal data only for as long as necessary to fulfill the purposes for which it was collected. Once these purposes are met, we will securely destroy the data without undue delay, unless there is a legal requirement to retain it for a specific period. In such cases, we will retain the data until the legal retention period expires or the original purpose is fulfilled,

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whichever is longer. Additionally, if the data is needed for an ongoing judicial matter, we will retain it until the legal process is concluded.

Your personal data will also be retained in accordance with the period authorized by regulatory authorities and for the purposes specified in this Privacy Notice. We will use and retain information as necessary for a period of 10 years to comply with legal obligations, resolve disputes, and enforce our legal agreements and policies, following instructions from regulatory authorities such as the Council of Health Insurance (CHI), the Insurance Authority, the Saudi Data and Artificial Intelligence Authority (SDAIA), and other applicable regulations within the Kingdom of Saudi Arabia. During the retention period, we will implement all necessary organizational, administrative, and technical measures to ensure the security and protection of your personal data.

2.12 Automated Decision Making

Automated decisions are decisions concerning you which are made automatically on the basis of a computer determination (using software algorithms), without human intervention. We do not use automated decision-making.

2.13 What are your data protection rights?

Your duty to inform us of changes:

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes by keeping your details up to date on our website and by sharing your updated details with our DPO at dp.officer@walaa.com.

Your rights in connection with personal data:

Under certain circumstances, by law, you have the right to:

- ◆ Be informed: We must inform you what is being collected, from whom it is collected, what it is being used for, how long it will be kept, and if and with whom it will be shared.
- ◆ Be provided with sufficient information on the automated decision-making mechanism, if any, in plain and clear language.
- ◆ Access personal data: We must provide a method in which you can access your personal data, when requested.
- ◆ Correct, update, complete personal data: We must enable you to correct/ update/ complete your personal data in case your data is incomplete, outdated or is inaccurate.
- ◆ Destruct personal data: We must destruct your personal data upon your request and when it is considered lawful under the PDPL.
- ◆ If you have any complaints regarding the implementation of this law or the associated regulations, you may submit them to the Competent Authority. The regulations provide the rules for processing these complaints.

2.13.1 Fees for excessive or unreasonable requests

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

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Time limit to respond.

Walaa tries to respond to all legitimate requests within 30 days. Occasionally, it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

2.14 What Walaa may need from you?

Walaa may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

We may also contact you to ask you for further information in relation to your request to speed up our response. If you wish to exercise any of the rights set out above, please contact us at dp.officer@walaa.com

2.15 Indemnity and Limitation of Liability

By using this site, you agree to defend, indemnify, and hold harmless Walaa, its officers, directors, and employees from any claims, liabilities, damages, losses, or expenses, including reasonable legal fees and settlement costs, that arise from or are related to your access to or use of the site.

Although Walaa shall make every attempt to keep the Website free from viruses, it cannot guarantee that it is virus/malware-free. For your own protection, you should take the necessary steps to implement appropriate security measures and utilize a virus scanner before downloading any information from the website.

Walaa, its directors, and its employees shall not be liable in any manner whatsoever for any direct, indirect, incidental, consequential, or punitive damage resulting from the use of,

Access to, or inability to use the information available on the Website or the services provided by us. Walaa, its directors, and employees shall not be liable in any way for possible errors or omissions in the contents of the Website.

2.16 Intellectual Property Rights

All information on this website is protected by copyright and other intellectual property rights. No images, text, or other content from this website may be distributed or reproduced without prior written approval from Walaa.

2.17 Changes to this data privacy notice

We may update this data privacy notice from time to time in response to emerging legal, technical, contractual, regulatory, or business developments. When we update our data privacy notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any privacy notice changes if and when this is required by applicable laws.

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You can see when this privacy notice was last updated by checking the “last updated” date displayed at the top of this privacy notice. If you have any questions about this privacy notice, please contact the DPO at dp.officer@walaa.com