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Privacy Policy

Policy Ref.	:	JLW-ISMS-PL-21
Revision No.	:	00
Date	:	29.06.2026

REVISION HISTORY

Rev. No	Date	Remarks
00	29.06.2026	Initial issue

1. Purpose

The purpose of this Privacy Policy is to establish the principles governing the collection, use, storage, disclosure, transfer, retention and protection of Personal Data processed by James L Williams Middle East Limited ("JLW") in connection with its business operations.

This Policy is intended to ensure compliance with applicable data protection legislation in the jurisdictions in which JLW operates, including the Kingdom of Saudi Arabia Personal Data Protection Law (PDPL), the United Arab Emirates Federal Decree Law No. 45 of 2021 on the Protection of Personal Data (where applicable), and any other applicable privacy legislation.

2. Scope

This Policy applies to:

- all JLW staff and contractors;
- all business units, offices and project locations operated by JLW;
- all Personal Data processed by JLW, whether relating to employees, job applicants, clients, consultants, subcontractors, suppliers, Joint Venture personnel or other individuals;
- all Personal Data processed within the UAE, KSA or any other jurisdiction in which JLW conducts business.

3. Definitions

Personal Data means any information relating to an identified or identifiable natural person.

Processing means any operation performed on Personal Data including collection, recording, storage, use, disclosure, transfer, deletion or destruction.

Data Subject means the individual to whom the Personal Data relates.

Sensitive Personal Data means Personal Data requiring enhanced protection under applicable law.

Personal Data Breach means any accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Personal Data.

4. Categories of Personal Data

JLW may process identification data, biometric data, passport/visa data, medical fitness certificates, vehicle information contact details, employment records, payroll and financial information, project records, supplier information, visitor records, CCTV footage, IT logs, website usage data, and other data necessary for business operations.

5. Sources of Personal Data

JLW may collect personal data directly from Data Subjects, recruitment agencies, clients, suppliers, subcontractors, consultants, public authorities, publicly available sources, project documentation, visitor management systems, CCTV systems, website interactions, Microsoft 365 services, and other lawful business sources as permitted under applicable laws, contracts and other agreements.

Personal Data shall only be collected where:

- it is necessary for legitimate business purposes;
- it is necessary to perform a contract;
- it is required to comply with legal or regulatory obligations;

- it is necessary to protect legitimate interests permitted under applicable law; or
- the individual has provided consent where required by applicable legislation.

Personal Data shall only be collected from lawful and transparent sources.

6. Purposes of Processing

Personal data is processed for recruitment, employment administration, payroll, project delivery, contract management, procurement, supplier management, client relationship management, HSE, access control, information security, regulatory compliance, financial management, legal claims, and website administration.

Personal data shall only be processed for the specific, explicit and legitimate purposes for which it was collected.

Any further processing shall only be carried out where permitted under the applicable data protection legislation or with an appropriate lawful basis.

7. Data Minimisation

JLW shall collect and process only the minimum amount of personal data necessary to achieve the intended business, legal or contractual purpose. Personal data that is excessive or irrelevant shall not be collected.

8. Legal Basis

JLW shall process personal data only where one or more lawful bases under the applicable data protection legislation apply, including consent where required, contractual necessity, compliance with legal obligations, protection of vital interests, legitimate interests where permitted by law, or any other lawful basis recognised under the applicable data protection legislation.

9. Accuracy of Personal Data

JLW shall take reasonable steps to ensure that personal data is accurate, complete and kept up to date. Inaccurate or incomplete personal data shall be corrected or updated without undue delay.

10. Sharing Personal Data Within Organization

Within organization, access to user personal data is restricted to authorized personnel who require it to perform their job duties. James L Williams Middle East implement strict internal controls and access management practices to ensure that only those individuals who need to handle personal data for legitimate purposes have access to it. Additionally, all employees and contractors are bound by confidentiality agreements to safeguard personal information and ensure it is used solely for the purposes outlined in this privacy policy. James L Williams Middle East regularly review and update access controls to align with best practices and protect data against unauthorized access or misuse.

Where third parties process Personal Data on behalf of JLW, appropriate contractual Data Processing Agreements (DPAs), confidentiality obligations and security controls shall be implemented.

Personal data shall only be disclosed on a need-to-know basis and only where appropriate contractual, confidentiality and security measures are in place.

11. Sharing Personal Data outside the Organization

JLW may share personal data with clients, consultants, subcontractors, banks, insurers, auditors, certification bodies, legal advisers, cloud service providers, government authorities and regulators where required.

Personal data shall only be disclosed on a need-to-know basis and only where appropriate contractual, confidentiality and security measures are in place.

Where third parties process Personal Data on behalf of JLW, appropriate contractual Data Processing Agreements (DPAs), confidentiality obligations and security controls shall be implemented.

12. International Transfers

Where Personal Data is transferred outside the jurisdiction in which it was collected, JLW shall ensure that appropriate contractual, organisational and technical safeguards are implemented in accordance with applicable data protection legislation.

International transfers shall only be undertaken where permitted under the PDPL and its Executive Regulations, appropriate safeguards have been implemented, and any regulatory requirements have been satisfied.

13. Retention

Personal data shall be retained only for as long as necessary to fulfil business, legal, contractual and regulatory obligations in accordance with the Records Retention Policy (JLW-ISMS-PL-23).

Upon expiry of the applicable retention period, Personal Data shall be securely deleted, anonymised or destroyed unless continued retention is required by law, litigation, regulatory investigation or contractual obligations.

14. Information Security

JLW protects personal data through its ISO/IEC 27001 Information Security Management System including access control, encryption, MFA, endpoint protection, logging, backups, vulnerability management, secure disposal and supplier security management.

Security controls shall be proportionate to the sensitivity and classification of the Personal Data being processed.

15. Privacy by Design & Default

Privacy considerations shall be integrated into the design, implementation and procurement of new systems, technologies, business processes and projects to ensure that personal data is adequately protected throughout its lifecycle.

16. Personal Data Breaches

Any actual, suspected or potential Personal Data Breach involving accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or unauthorised access to personal data shall be immediately reported to the Compliance Manager. Such incidents shall be managed in accordance with JLW's Personal Data Breach Management Procedure (JLW-ISMS-PR-15) and Incident Management Procedure (JLW-ISMS-PR-02).

JLW shall assess the impact of the breach on Data Subjects, implement appropriate containment and corrective actions, and fulfil any regulatory notification obligations within the timelines prescribed by applicable laws and regulations.

Where required by applicable law, affected Data Subjects shall also be notified without undue delay where the breach is likely to result in a high risk to their rights or freedoms.

17. Accountability

JLW shall maintain appropriate records, policies, procedures and evidence demonstrating compliance with the PDPL, conduct periodic reviews, and implement corrective actions where necessary.

JLW shall conduct periodic privacy risk assessments, internal audits, management reviews and awareness training to demonstrate ongoing compliance.

18. Data Subject Rights

JLW recognises and facilitates the exercise of Data Subject rights in accordance with applicable data protection legislation.

- **Right to be informed:** Individuals have the right to be informed about the collection, processing, and storage of their personal data.
- **Right of access:** Individuals can request access to their personal data held by organizations and obtain information about how it is being used.
- **Right to rectification:** Individuals have the right to request the correction or updating of their inaccurate or incomplete personal data.
- **Right to erasure:** Individuals can request the deletion or removal of their personal data when it is no longer necessary for the purpose for which it was collected or if the processing is unlawful.
- **Right to data portability:** Individuals can request the transfer of their personal data to another organization in a structured, commonly used, and machine-readable format.
- **Right to withdraw consent:** Individuals can, at any time, withdraw their consent to the processing of their personal data. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdraw.

The exercise of these rights shall be subject to any limitations, exemptions or conditions provided under the PDPL and applicable regulations.

Any complaint related to the processing of personal data shall be forwarded to compliance@jlwme.com.

19. Processing Personal Data of Individuals Lacking Full or Partial Legal Capacity

Where JLW processes personal data relating to individuals lacking full or partial legal capacity, such processing shall comply with applicable legal requirements and, where necessary, be undertaken through their legal guardian or authorised representative.

20. Cookies

The JLW website may use essential and analytical cookies. Additional cookies requiring consent will only be used after obtaining appropriate consent.

Further information regarding cookies is available within the JLW Website Cookie Notice, where applicable.

21. Contact Us

For any questions, concerns, or requests regarding our privacy policy, please contact:

Compliance Manager
James L Williams Middle East
E-mail: compliance@jlwme.com.

James L Williams Middle East is committed to addressing your privacy related enquiries promptly and ensuring that your privacy preferences are respected.

22. Compliance

All employees, contractors, vendors and third-party service providers processing personal data on behalf of JLW are responsible for complying with this Policy. The Compliance Department shall monitor implementation and coordinate compliance activities.

All third-party service providers processing Personal Data on behalf of JLW shall comply with contractual privacy and information security obligations.

23. Records of Processing Activities

JLW shall maintain records of personal data processing activities where required by applicable law and internal governance requirements in accordance with applicable legal and regulatory requirements.

24. Regulatory Compliance

This Policy establishes the minimum privacy requirements applicable throughout JLW. JLW shall comply with all applicable data protection and privacy laws in the jurisdictions in which it operates. Where local legislation imposes more stringent requirements, those legal requirements shall prevail.

25. Penalty for non-compliance

Breaches or suspected breaches of this Policy shall be reported promptly to the Compliance Manager and investigated in accordance with JLW's applicable policies and procedures. Where a breach is substantiated, appropriate corrective and disciplinary action may be taken in accordance with JLW's Disciplinary Proceedings in compliance with applicable employment law.

Nothing in this Policy limits JLW's obligations under applicable data protection legislation or the powers of competent regulatory authorities to investigate, enforce or impose statutory penalties where applicable.

26. Review & Update

The Compliance Manager and the Contracts Manager shall review this Policy at least annually to ensure its continued adequacy, effectiveness and relevance. This Policy shall also be reviewed whenever there are significant changes to JLW's business operations, processing activities, organisational structure, products, services or technologies, changes in applicable laws or regulations, following significant information security incidents or personal data breaches, or where otherwise necessary to ensure continued compliance with applicable legal and regulatory requirements.

27. Appendix

Reference:

Standard / Framework / Regulation	Control / Clause Reference
KSA PDPL (Royal Decree M/19)	Articles 11, 12, 13, 25
UAE Federal Decree Law No. 45 of 2021 on the Protection of Personal Data	
ISO/IEC 27001:2022, Information security, cybersecurity and privacy protection-Information security management systems-Requirements.	
Personal Data Breach Management Procedure	JLW-ISMS-PR-15
Incident Management Procedure	JLW-ISMS-PR-02
Records Retention Policy	JLW-ISMS-PL-23
Information Classification Policy	JLW-ISMS-PL-24