



NMC Healthcare Group

Employee Privacy Statement

Introduction

NMC Healthcare Group has developed this Privacy Statement to clarify how we collect, retain, use, process, share, and transfer your personal data as an employee of NMC Healthcare Group. It aims to provide guidance on your privacy rights and choices concerning how your personal data is handled by us.

About NMC Healthcare Group

NMC Healthcare Group is owned and operated by NMC OpCo Ltd whose registered office is located at DD # 16 – 109 – 001, 16th Floor, WeWork Hub71, Al Khatem Tower, ADGM Square, Al Maryah Island, PO Box: 764659, Abu Dhabi, UAE. It comprises several related businesses operating under the NMC, Cosmesurge, Fakh IVF, Provita, Americare, Aesthetics, brands in the UAE, Oman, and Kuwait.

NMC Healthcare Group (also referred to as “we” or “us” elsewhere in this Privacy Statement) together are responsible for your personal data as Independent Controllers, Joint Controllers or Data Processors, depending on the purpose for which your data is being processed. Please see the section on Transferring Your Data Within the NMC Healthcare Group below for details.

Our Commitment to Privacy

Our privacy commitments are fundamental to the way we run our business. We strive to strike the right balance between processing employee data to meet the purposes outlined below and protecting the privacy of our staff. Our Human Resources department has carefully



assessed each aspect of our operations to determine the right amount of data required to run its operations while maintaining strict privacy standards.

Scope

This Privacy Statement applies to all information we collect about you as an employee of NMC Healthcare Group. It includes information we collect directly from you, information collected automatically, information we collect through our mobile application(s) and information we collect from third parties.

Personal, Anonymous and Aggregate Information

Personal data, also referred to as personally identifiable information (PII) is information that identifies or can reasonably be used to identify you. Anonymous information (i.e., information that doesn't or can't be reasonably used to identify you specifically) and aggregate information (i.e., information taken from many peoples' data that is combined into groups or categories) are not considered personal data.

Examples of personal data include your:

- 1) **Name and contact information** - For example, your first and last name, email address, mailing address, phone number, photo, beneficiary and emergency contact details and other similar contact data.
- 2) **Demographic data** - For example, your date of birth and gender. We may also ask about your parental status and military status.
- 3) **National identifiers** - For example, your national ID/passport, citizenship status, residency and work permit status, social security number or other taxpayer/government identification number.
- 4) **Employment details** - For example, your previous job title/position, employer name and similar.
- 5) **Spouse's/partner's and dependents' information** - For example, your spouse and dependents' first and last names, dates of birth and contact details.



- 6) **Background information** - For example, your academic and professional qualifications, education, CV/Resume. We also maintain employees criminal record (police clearance) for certain positions.
- 7) **Video, voice, and image** - We may collect and use your video, voice, and image data, subject to the requirements of local law, or internal policy.
- 8) **Financial information** - For example, your bank account details, tax information, salary, retirement account information, company allowances and other information necessary to administer payroll, taxes, and benefits.
- 9) **Geo-location data** - such personal data refers to information that identifies or can be used to identify your geographic location often using data processed by personal devices you may be using such as mobile phones, laptops, tablets, and similar.
- 10) **Social media information** - collected or generated through your use of social media platforms. This may include profile information, interactions with us or comments made on our social media accounts, and data related to private messages between you and us.
- 11) **Information contained in online identifiers** such as cookies and similar technologies.

We may also process more sensitive personal data (also known as Special Category Data) including information relating to racial and ethnic origin, religious, political, or philosophical beliefs, trade union membership or information about your health, disabilities, and sexual orientation.

Personal information does not include:

- (a) De-identified or anonymised information (i.e., information about you where information that can be used to identify an individual has been removed permanently).
- (b) Aggregated consumer information (i.e., information taken from many people's data and combined into anonymous groups or categories).
- (c) General business contact information that does not identify an individual.
- (d) Information about deceased persons.

The Personal Data We Use

We want you to know exactly what data we collect and use. NMC Healthcare Group may collect and use the following information:

- Your name and other personally identifying information
- Demographic data and national identifiers
- Financial information
- Login and authentication information
- Online profile information
- Online activity
- Information about the device(s) you use
- Support information
- Date of birth
- Video, voice and image
- Background information
- Criminal Record (Police Clearance)
- Copy of identification document
- Location information and GPS data

Special categories of personal data

We also collect and use more sensitive personal data (known as "Special Category Data") about you.

Special category data must be handled even more sensitively than "standard" personal data. Your special category personal data will be managed in accordance with the Abu Dhabi Global Market (ADGM) Data Protection Regulations (ADGM DPR).

The special category personal data we hold about you may include some or all the following:

- *Details of your health.* This may include personal data about your health such as medical tests necessary for issuing visa or administering sick leaves. We provide further details below on the way we handle such personal data.
- *Details of your religion*
- *Details of biometric data* relating to you

The confidentiality of your medical information is important to NMC Healthcare Group. We make every effort to prevent unauthorised access to and use of information relating to your physical and mental health. In doing so, we comply with UAE and Oman data protection law, as well as other data protection laws in the jurisdictions where we operate.

How we Use Personal Data

We use your personal data in a variety of ways in order to manage your employment with us, comply with legal obligations, analyse the data and manage our business.

How we collect your personal data

Directly From You

We may collect personal data directly from you in the following instances:

- When you enter into an employment contract with us
- Throughout the course of your employment
- During remote or virtual meetings with HR or other professionals
- Through interactions via email, phone calls, or other communication channels.



- When you submit information through forms on our internal systems or websites.
- By contacting us with inquiries or questions via email, our website, or social media platforms.
- Through written correspondence or communication via telephone.
- When you visit our facilities and are recorded on our CCTV systems.
- When you apply for a position within the NMC Group.
- When you participate in HR-related marketing activities.
- By enrolling in employee-focused campaigns or initiatives supported by the company.
- When using our systems and equipment.

From Other Sources

As part of our commitment to ensuring the best possible employment experience for you, we may need to collect personal data from external sources. This may include obtaining relevant information from:

- previous employers
- educational institutions
- professional organisations.

This data helps us make informed decisions during the hiring process and ensures that we provide you with appropriate support and resources throughout your employment with NMC Healthcare Group.

We may also collect personal data about you from other third parties in the following ways:

- solicitors or other third parties acting on your behalf in connection with medico-legal proceedings
- your health insurance policy provider
- experts (including medical experts) and other service providers
- government agencies

In such cases, we will inform you that we have received your personal data from third parties, along with required information under applicable data protection laws.

Legal Bases for using your Personal Data

We use or process your personal data for several different purposes but in all cases, we must have a legal basis for doing so. When we use Special Category personal data such health data, (see section on Special categories of personal data above) we must also have a specific additional legal basis to do so.

Below we have outlined the purposes for which NMC Healthcare Group entities process your personal data as employers and the legal bases for doing so.

NMC AssetCo processes employee personal data jointly with such NMC Healthcare Group entities as joint controllers. In such cases NMC AssetCo relies on Legitimate Interests as its legal basis for processing. You have the right to object to any processing that is based on Legitimate Interests. Please see the 'Your Rights' section for More Information. Where we process Special categories of personal data, NMC AssetCo does so in order to comply with its obligations under labour law and to ensure that NMC Healthcare Group and our employees are able to exercise their respective rights under these laws.

Purpose	Details	Legal Basis	Special Category (Health) Data:
<p>1. TO PROVIDE HR SUPPORT TO EMPLOYEES</p>	<ul style="list-style-type: none"> Throughout your employment we provide you with various types of administrative support. This includes different aspects like managing employment status changes, and addressing queries related to certificates, leaves, and other employment-related matters. 	<p>Legitimate Interests</p> <p>We enhance our employee lifecycle management process to better support them throughout their employment journey, including hiring, retirement, and addressing employment-related queries. This is done while ensuring that appropriate safeguards protect your privacy and interests without undue interference.</p> <p>Please note that you have the right to object to any processing based on Legitimate Interests. Please see <i>Right to Object to The Processing of Your Personal Information</i> (in the <i>Your Rights</i>, section) for more information.</p>	
<p>2. TO MAINTAIN EMPLOYEE FILES AND RELATED DOCUMENTS FOR EMPLOYMENT PURPOSES</p>	<p>Throughout your employment, we maintain files and related information to record different aspects of your employment with us. This includes joining information, your</p>	<p>Legal obligation</p> <p>Processing is necessary for compliance with a legal obligation to which the Controller is subject under Applicable Law.</p> <p>Storing personal data is a legal requirement.</p>	<p>Obligations in the field of Employment Law</p> <p>Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the</p>

Purpose	Details	Legal Basis	Special Category (Health) Data:
<p>3. TO MANAGE INVESTIGATIONS AND DISCIPLINARY ACTIONS EFFECTIVELY.</p>	<p>performance, your employment contract, and others.</p> <p>We need to carry out investigations and disciplinary actions to address suspected or proven breaches of NMC Group’s Code of Conduct and Ethics, subsidiary polices or the law, regarding fraud or other allegations. Depending on the nature of the incident, your information may be stored using MS 365 applications, in CaseTrac, or the Incident Management System.</p>	<p>Legitimate Interests</p> <p>We ensure fair and effective investigation and disciplinary processes within our Organisation. By managing these processes, we uphold your rights while maintaining the integrity and security of our company.</p> <p>Please note that you have the right to object to processing based on Legitimate Interests. Please see <i>Right to Object to The Processing of Your Personal Information</i> (in the <i>Your Rights</i>, section) for more information.</p>	<p>controller or of the data subject in the field of employment law, provided that when the processing is carried out, the controller has an appropriate policy document in place in accordance with the law</p>

Purpose	Details	Legal Basis	Special Category (Health) Data:
<p>4. TO ENSURE THAT HEALTHCARE PROFESSIONALS MAINTAIN VALID MEDICAL LICENSES</p>	<p>We maintain this process to ensure that our healthcare professionals, always possess valid and up-to-date licenses. This is in line with industry standards and legal requirements, ensuring that our staff remain competent and compliant.</p>	<p>Contract We process your personal information to fulfil our contractual obligations to you as a healthcare professional. Ensuring that your licenses are valid and up to date is essential for us to deliver on our commitments outlined in our employment agreement.</p> <p>Providing personal data is a contractual requirement. Failure to do so might prevent us from perform our contract with you.</p>	<p>Contract We process your personal information to fulfil our contractual obligations to you as a healthcare professional. Ensuring that your licenses are valid and up to date is essential for us to deliver on our commitments outlined in our employment agreement.</p>
<p>5. TO FACILITATE THE ISSUANCE OF EMPLOYEE VISAS AND NECESSARY LICENSES</p>	<p>When you join NMC we need to process your personal and special categories of personal data to obtain necessary work permits and visas.</p>	<p>Legal Obligation Processing is necessary for compliance with a legal obligation to which the Controller is subject under Applicable Law;</p>	<p>Obligations in the field of Employment Law Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment law, provided that when the processing is carried out, the controller has an appropriate policy</p>

Purpose	Details	Legal Basis	Special Category (Health) Data:
<p>6. FILLING OPEN POSITIONS</p>	<p>If you apply for a job at elsewhere within NMC Healthcare Group, your personal data will be processed as part of our Talent Acquisition process. This encompasses activities such as job requisition approval, shortlisting, assessment, interviews, and extending offers to successful candidates.</p>	<p>Contract The processing of personal data within this process is necessary to ultimately enter into an employment contract with you, if you are successful during the selection process.</p>	<p>document in place in accordance with the law</p>
<p>7. TO ENSURE THAT EMPLOYEE DOCUMENTS NECESSARY FOR THEIR EMPLOYMENT ARE COLLECTED.</p>	<p>During the Pre-Onboarding process, we collect employee documents necessary for your employment. This includes gathering identification documents, educational certificates, and other credentials vital for verifying employment eligibility and ensuring compliance with regulatory requirements.</p>	<p>Contract The processing of personal data within this process is necessary to fulfil our contractual obligations to you as an employee. By providing us with your personal data, including relevant information for work permits and visas, you enable us to facilitate the issuance of these documents, as required for your employment, ensuring compliance with legal requirements, and facilitating the execution of your employment contract with us. Providing personal data is a contractual requirement. Failure to do so might prevent us from entering into a contract of employment with you.</p>	<p>Contract The processing of personal data within this process is necessary to fulfil our contractual obligations to you as an employee. By providing us with your personal data, including relevant information for work permits and visas, you</p>

Purpose	Details	Legal Basis	Special Category (Health) Data:
<p>8. PROVIDING TRAINING TO EMPLOYEES</p>	<p>Employee Training encompasses a range of essential programmes, including mandatory sessions like ethics and compliance, fire & safety, infection control, quality, ADHICS, OSH, and more. Some of this training is delivered by individual NMC Group entities while others are administered by NMC AssetCo.</p>	<p>Legitimate Interests</p> <p>Our Legitimate Interests lies in providing comprehensive employee training programmes. These initiatives are designed to enhance the skills and knowledge of our workforce, contributing to their professional development.</p> <p>Please note that you have the right to object to processing based on Legitimate Interests.</p> <p>Please see <i>Right to Object to The Processing of Your Personal Information</i> (in the <i>Your Rights</i>, section) for more information.</p>	<p>enable us to facilitate the issuance of these documents, as required for your employment, ensuring compliance with legal requirements, and facilitating the execution of your employment contract with us.</p>
<p>9. PROVIDING PROFESSIONAL</p>	<p>We develop and deliver diverse training programmes covering leadership, professional growth, and project-</p>	<p>Legitimate Interests</p> <p>Our Legitimate Interests lies in providing valuable non-clinical training opportunities to enhance the skills and capabilities of our staff. This ensures their professional development and</p>	

Purpose	Details	Legal Basis	Special Category (Health) Data:
<p>TRAINING FOR ALL NMC GROUP STAFF</p>	<p>specific learning for all NMC Group staff. We may utilize different platforms or contracting third parties, both offline and online sessions are managed uniformly, with attendance tracked for leadership training.</p>	<p>contributes to the overall success of our Organisation, while ensuring that our interests do not unduly override the interests of our employees.</p> <p>Please note that you have the right to object to processing based on Legitimate Interests. Please see <i>Right to Object to The Processing of Your Personal Information</i> (in the <i>Your Rights</i>, section) for more information.</p>	
<p>10. TO CONDUCT PERFORMANCE REVIEWS OF EMPLOYEES</p>	<p>During your employment we will process personal data about you that relates to your performance at work. This information may be fed into a formal performance management process. Both NMC AssetCo and your local NMC Healthcare Group entity process this information. The results are held in your employee file by the HR department.</p>	<p>Legitimate Interests</p> <p>It is within our Legitimate Interests to conduct performance reviews of employees, utilizing personal data obtained for this purpose, to assess performance, provide feedback, and support professional development, ensuring alignment with Organisational objectives, provided that these interests do not unduly override your own interests.</p> <p>Please note that you have the right to object to processing based on Legitimate Interests. Please see <i>Right to Object to The Processing of Your Personal Information</i> (in the <i>Your Rights</i>, section) for more information.</p>	
<p>11. TO IDENTIFY DEVELOPMENT NEEDS AND COMPILE</p>	<p>Succession Planning evaluates participants' performance against leadership criteria at the Leadership Development</p>	<p>Legitimate Interests</p> <p>We have a Legitimate Interests in conducting Succession Planning to ensure the ongoing development and preparedness of our workforce for critical roles, while safeguarding the</p>	

Purpose	Details	Legal Basis	Special Category (Health) Data:
<p>SUCCESSION PLANS FOR CRITICAL ROLES</p> <p>12. TO PROVIDE THE EMPLOYEE ASSISTANCE PROGRAMME (EAP) FOR GROUP EMPLOYEES</p>	<p>Centre (LDC). This highlights growth opportunities for future roles or successors to key positions. Participants receive advance information about how their data will be used. Line Managers receive summarized reports, with raw scores kept confidential. Access to LDC results is restricted to the L&D team.</p> <p>The EAP offers a range of services to support employees, including counselling and coaching for personal and work-related challenges. Through a Management Referral Programme, supervisors and managers can refer employees to the EAP, if their work performance is at risk due to personal or work-related concerns. Following engagement,</p>	<p>confidentiality of individual performance data and maintaining the trust of our employees.</p> <p>Please note that you have the right to object to processing based on Legitimate Interests. Please see <i>Right to Object to The Processing of Your Personal Information</i> (in the <i>Your Rights</i>, section) for more information.</p> <p>Legitimate Interests</p> <p>We have a Legitimate Interest in maintaining the well-being and performance of our workforce through the Employee Assistance Program (EAP). This includes,</p> <ul style="list-style-type: none"> a) providing counselling and coaching services to address personal and work-related challenges, as well as facilitating early intervention through our Management Referral Programme. b) Obtaining feedback from employees about their experiences with the EAP and its coaches, thus allowing us to continuously improve our services and ensure employee satisfaction. 	<p>Explicit Consent</p> <p>Where your health data is being processed while receiving counselling and coaching support. You can withdraw your consent at any time.</p> <p>Please see Section "Your Rights", "Right to object to How we Use Your Personal Information for Direct Marketing Purposes" and the "Right to Withdraw Your</p>

Purpose	Details	Legal Basis	Special Category (Health) Data:
<p>13. TO PROVIDE EMERGENCY RESPONSE SUPPORT (PART OF EAP)</p>	<p>employees have the opportunity to provide feedback on their experience with the coach and the EAP. Additionally, coached compile reports for statistical analysis. Anonymised feedback may be shared with other departments.</p>	<p>c) Compiling anonymized reports for statistical analysis, enabling us to identify trends in employee well-being and tailor our support accordingly.</p> <p>Please note that you have the right to object to processing based on Legitimate Interests. Please see <i>Right to Object to The Processing of Your Personal Information</i> (in the <i>Your Rights</i>, section) for more information.</p>	<p>Consent" for more information.</p> <p>Archiving and Research Purposes</p> <p>(For Statistical purposes). Processing is necessary for archiving and research purposes in accordance with applicable law.</p>
	<p>The EAP offers crisis counselling for suicidal employees, providing immediate, short-term interventions to stabilize them and formulate an action plan. Based on the counsellor's evaluation of risk severity, EAP may recommend the employee to specialized mental health services, such as a psychiatrist or clinical psychologist.</p>	<p>Vital Interests</p> <p>We need to process your personal and health information to protect your vital health interests for instance if an employee declines support from our EAP, despite their right to do so, yet displays severe distress or signs of suicidal thoughts, EAP may involve relevant parties to inform the employee about available support and interventions for their well-being.</p> <p>Moreover, if an employee shows immediate signs of self-harm or poses a serious risk to themselves during support sessions, EAP may share this information with their emergency contact or immediate manager. This action ensures a prompt and suitable response to protect the individual's safety and well-being.</p>	<p>Vital Interests</p> <p>Processing is necessary to protect vital interests of the Data Subject or of another natural person where the Data Subject is physically or legally incapable of giving Consent.</p>
<p>14. TO MANAGE AND ADMINISTER HEALTH INSURANCE FOR NMC</p>	<p>We want to assure you that your health insurance needs are taken care of. Our HR Shared Services</p>	<p>Contract</p> <p>Processing personal data for health insurance management is necessary to fulfil our contractual obligations to you as an employee. By providing us with your personal data, including</p>	<p>Obligations in the field of Employment Law</p> <p>Processing is necessary for the purposes of carrying</p>

Purpose	Details	Legal Basis	Special Category (Health) Data:
<p>GROUP EMPLOYEES AND THEIR DEPENDENTS.</p>	<p>team manages the employee insurance programme, ensuring that you and your dependents receive comprehensive coverage.</p>	<p>information required for health insurance enrolment, you enable us to ensure comprehensive coverage for you and your dependents, as stipulated in your employment contract.</p> <p>Providing personal data is a contractual requirement. Failure to do so might prevent us from perform our contract with you.</p>	<p>out the obligations and exercising specific rights of the controller or of the data subject in the field of employment law, provided that when the processing is carried out, the controller has an appropriate policy document in place in accordance with the law</p>
<p>15. INTERNAL AUDITS</p>	<p>We may conduct internal audits utilising employee data to produce independent assurance to the board regarding the adequacy and effectiveness of controls in place.</p>	<p>Legitimate Interests</p> <p>It is in our legitimate business interest to use your non-health related personal data, where necessary, to conduct internal audits and consult with experts to maintain efficient and effective operations, provided that these interests are not overridden by your own interests.</p> <p>Please note that you have the right to object to processing based on Legitimate Interests. Please see Right to Object to The Processing of Your Personal Information (in the Your Rights, section) for more information.</p>	
<p>16. LAW ENFORCEMENT REQUESTS</p>	<p>There may be times when we are required to provide the personal data of our patients or employees to law enforcement agencies such as the police, public</p>	<p>Legal Obligation</p> <p>In these situations, we are compelled to process your personal data to comply with a legal obligation to which we are subject.</p>	<p>Legal Obligation</p> <p>The exercise of a function or requirement conferred on a person by Applicable Law</p>

Purpose	Details	Legal Basis	Special Category (Health) Data:
17. ADMINISTERING PAYROLL	<p>health authorities and others. We will cooperate with these agencies whenever we receive such requests.</p>	<p>We must collect personal data from you and respond. Failure to provide data might affect your employment with us.</p>	
	<p>As part of our commitment to you, we manage the payroll process, ensuring that you receive your rightful compensation in a timely manner. This includes calculating salaries, bonuses, and expenses based on factors like your attendance, sick leave, working hours, and contractual agreements.</p>	<p>Contract Administering payroll is necessary to fulfil our contractual obligations to you as an employee. As part of your employment agreement with us, we commit to providing you with timely and accurate compensation for the work you perform. This includes calculating salaries, bonuses, and expenses based on factors such as your attendance, working hours, and contractual agreements.</p>	<p>Contract Administering payroll is necessary to fulfil our contractual obligations to you as an employee. As part of your employment agreement with us, we commit to providing you with timely and accurate compensation for the work you perform. This includes calculating salaries, bonuses, and expenses based on factors such as your attendance, working hours, and contractual agreements.</p>
18. CCTV RECORDINGS	<p>Storing and reviewing CCTV images is necessary to maintain safe and secure facilities.</p>	<p>Legal Obligation To comply with our legal and regulatory obligations to maintain safe and secure premises for visitors to our premises and our employees.</p>	

Purpose

Details

Legal Basis

Special Category
(Health) Data:

19. PROCESSING PERSONAL DATA FOR STATISTICAL PURPOSES

We need to process personal data for analytical and statistical purposes to understand trends, costs and gain other insights that would help us run our business. Where feasible, we will seek to anonymize the data.

Collecting personal data is a legal requirement. Failure to do so might attract consequences to Us.

Legitimate Interests

It is in our Legitimate Interests to process personal data for analytics purposes to gain information important for us to run the NMC business.

Please note that you have the right to object to processing based on Legitimate Interests. Please see *Right to Object to The Processing of Your Personal Information* (in the *Your Rights*, section) for more information.

Further Processing of Personal Data

*We will do our best let you know in advance what will happen to your personal data. We will not use your personal data for a purpose that is materially different from the purposes listed in this Privacy Statement. To assess whether the new purpose(s) are materially different we will carry out a so-called *compatibility test* to assess whether the new purposes is compatible with the old one and inform you of the new purpose.*

Third-Party Processing and Transfers Outside of ADGM

We may share your personal data with third parties to enhance your HR experience, improve our HR operations, or meet legal requirements. These entities could include recruitment platforms, consultancy firms, talent acquisition agencies, other NMC Group entities, and similar Organisations. These third parties may act as independent controllers, joint controllers or processors with whom we share your personal data for the following purposes:

- (a) Recruitment activities using third party service providers for activities such as video interviewing, candidate shortlisting, etc.
- (b) Other (non-ADGM) NMC Group entities for recruitment processes.
- (c) To provide employees with insurance, visas, labour and other permits, and licences.
- (d) To facilitate HR-related processes, such as payroll management and performance evaluations.
- (e) To collaborate with consultancy firms for employee training, development programmes and business management purposes.
- (f) To provide you with insurance, visa, labour and other permits and licences.
- (g) To provide you with tools such as equipment and software necessary to perform your duties.
- (h) To comply with requests from government agencies and regulatory bodies

Before sharing your personal data with any third party, we conduct thorough due diligence and, where feasible, establish appropriate agreements with them. These agreements clearly define the roles of each party or instruct data processors on the permissible purposes for processing personal data and the required standards.

When transferring personal data to another jurisdiction, we implement suitable safeguards such as contractual clauses approved by the ADGM Commissioner of Data Protection. However, this may not be necessary in certain cases such as where the transfer is essential for fulfilling a contract between you and the recipient controller or if you have requested steps to facilitate such a contract.

Retention of Personal Data

We follow all applicable laws governing the retention of your data and will not keep it in an identifiable format for longer than reasonably necessary.

We retain the data we collect from you for different periods depending what is required by law, on your preferences, where applicable, and the purposes we use it for. The personal data that we retain falls into the following categories:

- (i) Information we keep for periods required by applicable laws and regulations. We are committed to complying with all relevant legal requirements regarding the retention of employee data.
- (ii) Information retained until you remove it - we keep this data until you ask us to delete it. Please note that this is not an absolute right.
- (iii) We may retain personal data for specific business or legal purposes. For example, financial and insurance data are retained for tax, accounting, and record-keeping purposes. Incident reports may also be retained as required by local regulations for quality assurance purposes. Examples of this include:
 - (a) Financial information: This encompasses payroll records, expense claims, and reimbursement documentation necessary for maintaining accurate financial records and processing payments. We may keep it for longer as required by Applicable laws and our business needs.
 - (b) Employment and benefits information: This includes details related to employee benefits, such as insurance coverage, retirement plans, and any other employee-related financial records required for HR purposes.
 - (c) Incident Reports: We may retain your personal data related to workplace incidents or disciplinary actions for compliance and HR management purposes, as mandated by local regulations and internal policies.
 - (d) We may keep certain data where necessary to defend of legal claims or to start a proceeding against you.

Your Rights

You may have certain legal rights regarding your personal information depending upon the jurisdiction in which you are located or how we interact with you. You can exercise your rights by sending an email to the NMC Healthcare Group Data Protection Officer at dpo@nmc.ae. Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information to fulfil your request.

You can learn more about these rights here.

Subject to the terms of this Privacy Statement you have the right to:

To access your personal information.

You have the right to request that we provide you with a copy of your personal information that we hold, and you have the right to be informed of,

- (a) the purposes of the processing and the categories of personal data being processed;
- (b) who will receive the personal data;
- (c) where possible, how long we expect to keep the personal data, and if not possible, the criteria we use to determine that period;
- (d) where the Personal Data was not collected from you, any available information as to its source; and
- (e) the existence of automated decision-making, including profiling and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such Processing for the Data Subject.

To lodge a complaint with us.

We will receive and handle your complaints in accordance with best practice and any applicable law.

Right to rectify or erase personal information

You have the right to ask us to rectify inaccurate personal information we have collected from you where it is technically feasible for us to do so. In so doing, we may however take steps to verify the accuracy of the personal information before rectifying it.

You can also ask us to erase your personal information in limited circumstances where:

- (a) it is no longer needed for the purposes for which it was collected; or
- (b) you have withdrawn your consent (where the data processing was based on consent); or
- (c) following a successful exercise of the right to object; or
- (d) it has been processed unlawfully; or
- (e) to comply with a legal obligation to which NMC Healthcare Group is subject; or
- (f) for the establishment, exercise, or defence of legal claims.

Right to restrict the processing of your personal information

You can ask us to restrict your personal information, but only where:

- (a) its accuracy is contested, to allow us to verify its accuracy; or
- (b) the processing is unlawful, but you do not want it erased; or

- (c) it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- (d) you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- (a) we have your consent; or
- (b) to establish, exercise or defend legal claims; or
- (c) to protect the rights of another natural or legal person.

Right to transfer your personal information

You can ask us to give your personal information to you in a structured, commonly used, machine-readable format. You can also ask to have it transferred directly to another data controller, but in each case only where:

- (a) the processing is based on your consent or on the performance of a contract with you; and
- (b) the processing is carried out by automated means.

Right to object to the processing of your personal information

You can object to any processing, including profiling, of your personal information which has our Legitimate Interests as its legal basis if you believe your fundamental rights and freedoms outweigh our Legitimate Interests. This can be done at any time.

If you raise an objection, we have the option to demonstrate that we have compelling Legitimate Interests which override your rights and freedoms or that processing is necessary for the establishment, exercise, or defence of legal claims. Where we cannot do this, we will cease to process your personal data.

Where your personal Data is Processed for archiving and research purposes, you have the right to object to having your personal data processed, unless it is necessary to perform a task we are carrying out for reasons of public interest.

Right to object to how we use your personal information for direct marketing purposes

You can request that we change the way we contact you for marketing purposes. See *Right to withdraw consent* Section for more information on withdrawing consent.

You can request that we not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes.

Right to withdraw consent



You can withdraw your consent at any time. The withdrawal of Consent will not affect the lawfulness of processing based on consent before it was withdrawn.

Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction

You can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the ADGM or for any other restricted transfer. We may redact data transfer agreements to protect commercial terms.

Right to lodge a complaint with your local supervisory authority

Where your personal data is processed by a member of NMC Healthcare Group that is registered within the ADGM, you also have the right to lodge any complaints or concerns regarding the use of your personal data with the ADGM Commissioner for Data Protection (both health and non-health personal data) the local data protection authority at data.protection@adgm.com

Verifying your identity

Where you decide to exercise any of these rights, we may request additional information from you to help us verify your identity or to confirm that you have given authority to another person to exercise these rights on your behalf.

We do however reserve the right not to restrict access to your information or to limit your rights (e.g., if such disclosure is prohibited by law or if the rights of another individual might be violated). In some instances, this may mean that we are able to retain your personal data even if you withdraw your consent. Please contact the Data Protection Officer at dpo@nmc.ae for more information about your rights or to exercise any of them.

Conflicts between law and this privacy statement

If there is a conflict between this Privacy Statement and an applicable law, applicable law will apply to you. We will determine whether there is a conflict, so you do not have to.

Impact of automated decisions

We will not make any decision, policy, or assessment that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

Getting in touch with us

Your main point of contact for all issues arising from the use of your personal data, is the NMC Healthcare Group Data Protection Officer. The Data Protection Officer can be contacted in the following ways:

By email:

dpo@nmc.ae

By Post:

The Data Protection Officer,
NMC AssetCo,
10th Floor,
Al Ain Tower,
Khalidiya,
Abu Dhabi, UAE.

If you have any questions, concerns, or complaints regarding our compliance with this Privacy Statement and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us. We will investigate and attempt to resolve complaints and disputes. We will make every reasonable effort to honour your wish to exercise your rights as quickly as possible and, in any event, within the timescales provided by data protection laws.

Transferring Your Data Within NMC Healthcare Group

We may transfer your personal data to other entities within the NMC Healthcare Group where necessary for HR and administrative purposes.

Employees

If you are an employee, your personal data may be shared within the NMC Healthcare Group for various HR-related reasons, including but not limited to:

- (a) Transferring to a different department or location within the Organisation for career development or operational needs.
- (b) Referring to a different entity within the group for specialized training or mentorship opportunities.
- (c) Enabling access to certain benefits or services offered by other entities within the group, upon your request and with your consent.

- (d) Facilitating administrative processes such as payroll management, performance evaluations, and employee development initiatives.

Data Controller vs Data Processor

In most cases, your data will be accessed by relevant HR personnel within NMC Healthcare Group's Human Resources. Both HR and NMC AssetCo will act as Joint Controllers with shared responsibility for processing your data. NMC AssetCo will oversee all processing activities related to employee data, as outlined in the section on 'How we Use Your Personal Data' above. NMC AssetCo will also facilitate the exercise of employees' data rights and serve as a primary point of contact for data-related inquiries and requests.

Definitions

"Personal data", "personal information", or "PII" means any information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly — in particular, by reference to an identification number or to one or more factors specific to his or her physical, physiological, mental, economic, cultural, or social identity.

"Special Categories of Personal Data" refers to personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and the processing of data concerning health or sexual orientation.

"Sensitive personal data" either indicates "special categories" (see above) or is personal data of which the sensitivity level has been assessed and classified, indicating potential severe impact on an individual when confidentiality of such data is breached.

"Anonymised" is the deletion or changing of personal data in such a way that it can no longer be foreseeably assigned to a certain or ascertainable individual or only with a disproportionately high effort in terms of time, cost, and work.

"Consent" is any freely given, specific and transparently, unambiguous, well-informed indication of the will of the individual, whereby the individual agrees that his or her personal data may be processed. Particular requirements about consent can arise from the respective national laws. Where possible, consent is obtained in an explicit manner (unambiguously).

"NMC Healthcare Group" means, NMC OpCo Ltd and its subsidiaries. [Click here](#) for a detailed listing.

"NMC Healthcare Facility" means, a facility that is providing healthcare services such a hospital, clinic and similar.



NMC Healthcare Group Company Directory

To view which companies make up the NMC Healthcare Group, please visit <https://nmc.ae/en/privacy>.

Policy Reference Number: NMC/PP/HR/1329/01