

PART A | STATUS, SCOPE AND RESPONSIBILITY

1. About this Privacy Notice

- 1.1. Faisal Al Rashdi Advocates & Legal Consultants (**FALC, we, us or our**) respects the privacy of individuals whose personal data we receive or process.
- 1.2. This Privacy Notice explains how we collect, use, store, disclose, transfer and otherwise process personal data in connection with the legal and professional services we provide; enquiries from existing or prospective clients; our dealings with counterparties, professional advisers, service providers and other persons involved in matters on which we advise; our website, events, publications and business-development activities; recruitment and applications to work with FALC; and the administration, management and protection of the Firm.
- 1.3. This Privacy Notice has been prepared having regard to the PDPL and the PDPL Regulation.
- 1.4. It should be read together with the applicable Engagement Letter and any specific privacy or data-processing notice that FALC may provide in relation to a particular service, matter, process or activity.

2. Who is responsible for your personal data

- 2.1. For most processing described in this Privacy Notice, FALC determines the purposes and means for which personal data is processed and therefore acts as the Controller for the purposes of the PDPL.
- 2.2. Our contact details are:

Faisal Al Rashdi Advocates & Legal Consultants,
Office 505, Dar Al Noor, 5th Floor, Madinat Sultan Qaboos, Muscat, Sultanate of Oman;
email: info@falc.om;
telephone: +968 246 00 443.
- 2.3. In some circumstances, FALC may process personal data on behalf of another controller. Where that occurs, the privacy notice or instructions of that controller may also apply to the relevant processing.

3. Personal Data Protection Officer

- 3.1. FALC has designated a Personal Data Protection Officer responsible for assisting FALC in complying with the PDPL and the PDPL Regulation and serving as a contact point for matters relating to personal data.
- 3.2. Personal Data Protection Officer: Hoor Al Rushaidi; email: hoor@falc.om; telephone: (+968) 92300249; postal address: the FALC address specified in section 2 above.
- 3.3. You may contact the Personal Data Protection Officer regarding any matter concerning the processing of your personal data, including the exercise of the rights described in section 14.

4. Scope of this Notice

- 4.1. This Privacy Notice applies to personal data processed by FALC as a Controller in connection with the activities described in section 1.
- 4.2. It applies to personal data relating to Clients, prospective Clients, Client personnel, beneficial owners, directors, counterparties, witnesses, experts, professional advisers, suppliers, website users, event participants, job applicants and other individuals whose information FALC receives in the course of its professional and business activities.
- 4.3. Where another privacy notice or legally required notice applies to a specific processing activity, that notice should be read together with this Privacy Notice and will prevail to the extent of any specific inconsistency concerning that activity.

PART B | PERSONAL DATA, SOURCES AND PROCESSING

5. What personal data we may collect

- 5.1. The personal data we collect depends upon your relationship with FALC and the nature of the relevant matter or interaction.
- 5.2. We seek to collect and process only personal data that is reasonably necessary for the relevant purpose.

Category	Examples
Identity data	Name, title, nationality, date of birth, civil number, passport details, photograph and signature
Contact data	Address, email address, telephone number and other contact details
Professional and organisational data	Employer, position, directorships, professional qualifications, organisational relationships and authorised-representative details
Client and matter data	Instructions, correspondence, contracts, transaction information, corporate records, evidence, pleadings and other information relevant to a legal matter
Financial data	Bank details, payment information, invoices, source-of-funds information and financial information relevant to a matter
Compliance data	Beneficial ownership information, identification documents, AML/CFT information, sanctions-screening information and other client-verification data
Dispute and regulatory data	Court documents, regulatory correspondence, investigation material, claims, complaints, witness information and enforcement information
Website and technical data	IP address, device and browser information, website interactions, security logs and information collected through cookies or similar technologies
Recruitment data	CV, education, qualifications, employment history, references and information provided during recruitment
Marketing and communications data	Communications preferences, event participation, publication subscriptions and records of consent to marketing
Special category / sensitive data	Information of the type described in section 6 where relevant and lawfully processed
Other personal data	Any other information that you, our Client, a third party or a competent authority provides to us and which identifies or may identify an individual

6. Sensitive and specially protected personal data

- 6.1. Certain categories of personal data receive additional protection under Omani law. These include genetic data, biometric data, health data, racial origin, sex-life data, political or religious opinions, philosophical beliefs, criminal convictions and information relating to security measures.

- 6.2. Legal matters may occasionally require FALC to receive or process information falling within one or more of these categories.
- 6.3. Where applicable law requires a permit, consent or other authorisation before such data is processed, FALC will obtain the required permit, consent or authorisation before undertaking the relevant processing.
- 6.4. Access to such information will be restricted to persons who reasonably require it for the relevant purpose and will be subject to appropriate confidentiality and security controls.

7. Children's personal data

- 7.1. FALC does not ordinarily seek to collect personal data concerning children unless it is relevant to a legal matter or another legitimate activity of the Firm.
- 7.2. Where the PDPL applies to the processing of a child's personal data, FALC will obtain the explicit consent of the child's guardian where required and will limit the information processed to what is reasonably necessary for the relevant purpose.
- 7.3. Appropriate measures will be taken to protect children's personal data from unnecessary disclosure or use.

8. Where we obtain personal data

- 8.1. We may obtain personal data from the following sources:
 - (a) directly from you;
 - (b) from a Client that instructs us or provides information relevant to a Matter;
 - (c) from your employer, company, fund, partnership or other organisation;
 - (d) from counterparties and their lawyers or professional advisers;
 - (e) from courts, tribunals, ministries, regulators, governmental bodies and other competent authorities;
 - (f) from banks, financial institutions, auditors, accountants, experts, consultants, translators and other professional advisers;
 - (g) from corporate registries, court records, official databases, sanctions lists and other lawful public sources;
 - (h) from service providers assisting FALC with client verification, technology, document management, communications, security or administration;
 - (i) through our website, email systems and other communications with FALC; and
 - (j) from recruitment agencies, referees, educational institutions or other sources relevant to recruitment.
- 8.2. Where personal data is obtained from a source other than the data subject, FALC will handle that information in accordance with applicable law and our duties of confidentiality and professional secrecy.

9. Why and how we process personal data

- 9.1. Depending on the circumstances, FALC may process personal data for the following purposes:
 - (a) considering whether to accept a Client or Matter;
 - (b) carrying out conflict searches and client and matter acceptance procedures;
 - (c) complying with AML/CFT, sanctions, beneficial-ownership and other legal or regulatory requirements;
 - (d) establishing, managing and performing our engagement with a Client;
 - (e) providing legal advice and legal representation;
 - (f) conducting litigation, arbitration, negotiations, investigations, transactions and regulatory matters;
 - (g) communicating with Clients, counterparties, professional advisers, courts, regulators and other persons relevant to a Matter;
 - (h) preparing, reviewing, signing, filing, submitting, receiving, storing and managing legal and transaction documents;
 - (i) managing fees, invoices, payments, Client money and financial records;
 - (j) maintaining our Matter files, precedents, records and professional documentation;
 - (k) responding to complaints, disputes, investigations, court orders or regulatory requests;
 - (l) protecting FALC's systems, premises, Personnel, Clients, confidential information and legal rights;
 - (m) managing our suppliers, external counsel and other service providers;
 - (n) recruiting and assessing applicants;

- (o) organising events, providing publications and carrying out permitted business-development activities;
 - (p) administering and improving our website, technology and business operations; and
 - (q) complying with applicable legal, regulatory, professional, insurance, audit and record-keeping requirements.
- 9.2. Processing may include collecting, recording, organising, storing, reviewing, retrieving, analysing, using, modifying, communicating, disclosing, transferring, restricting, archiving, deleting or destroying personal data, to the extent necessary for the relevant purpose.

10. Consent and other circumstances permitted by law

- 10.1. Where you are a data subject and accept, sign or otherwise agree to an Engagement Letter that incorporates this Privacy Notice, you expressly acknowledge that you have received and understood this Privacy Notice and, to the extent that consent is required under applicable law, expressly consent to FALC collecting, using, storing, disclosing, transferring and otherwise processing your personal data for the purposes and in the manner described in this Privacy Notice.
- 10.2. Such consent includes, where applicable and subject to the safeguards required by law, the transfer of your personal data outside the Sultanate of Oman for the purposes described in this Privacy Notice.
- 10.3. Where processing is undertaken in circumstances to which an exclusion under Article 3 of the PDPL applies, or is otherwise required or permitted by applicable law, FALC may undertake that processing without relying upon consent.
- 10.4. You may withdraw consent in accordance with applicable law. Withdrawal does not affect processing undertaken lawfully before withdrawal and does not require FALC to cease processing where FALC is otherwise legally entitled or required to continue that processing.

PART C | DISCLOSURE, TRANSFERS, SECURITY AND RETENTION

11. Who we may disclose personal data to

- 11.1. FALC will not publish or disclose personal data except where the disclosure is authorised or permitted by applicable law.
- 11.2. Depending upon the Matter or purpose concerned, personal data may be disclosed to the following recipients.
- (a) FALC advocates, legal consultants, associates, trainees, paralegals and business-services Personnel who require access for authorised purposes;
 - (b) the Client and persons authorised by the Client;
 - (c) counterparties and their lawyers or advisers;
 - (d) courts, arbitral tribunals, experts, mediators and other dispute-resolution participants;
 - (e) ministries, regulators, governmental authorities, law-enforcement bodies and other competent authorities;
 - (f) foreign or local counsel and other professional advisers;
 - (g) auditors, accountants, banks and financial institutions;
 - (h) translators, experts, investigators, process agents, corporate service providers and other specialists;
 - (i) technology, cloud-hosting, document-management, communications, cybersecurity and other service providers acting for FALC;
 - (j) insurers, insurance brokers and professional advisers in connection with a complaint, claim or risk-management matter; and
 - (k) any other person where you have authorised the disclosure or the disclosure is otherwise permitted or required by law.
- 11.3. Disclosure is limited, so far as reasonably practicable, to the personal data necessary for the relevant purpose.
- 11.4. Where FALC engages a processor to process personal data on its behalf, we will put in place appropriate contractual and organisational arrangements governing that processing.

12. Transfers outside the Sultanate of Oman

- 12.1. The provision of legal services may involve communication or collaboration with persons, professional advisers or service providers outside the Sultanate of Oman.
- 12.2. Before transferring personal data outside Oman, FALC will, where consent is required by applicable law, ensure that the relevant data subject has provided the explicit consent described in section 9; assess the nature, volume and sensitivity of the data to be transferred; consider the purpose, scope and duration of the overseas processing; identify the countries and persons involved in the transfer; assess the risks that the transfer may create for the data subject; and take reasonable steps to ensure that the recipient provides a level of protection for personal data that is not lower than the protection required under the PDPL and the PDPL Regulation.
- 12.3. Consent may not be required where the transfer falls within an express statutory exception, including where it is required to fulfil an international obligation under an agreement to which the Sultanate of Oman is a party or where the transfer is undertaken in a manner that renders the data subject unidentifiable.
- 12.4. Where additional approval is required by another competent authority in relation to particular categories of information or systems, FALC will obtain that approval before undertaking the relevant transfer.

13. Security and confidentiality

- 13.1. FALC takes appropriate technical, organisational and procedural measures designed to protect personal data against unauthorised access, disclosure, alteration, loss, destruction or misuse.
- 13.2. Those measures may include access restrictions and user authentication; secure electronic systems and communications; information-security and cybersecurity controls; backup and recovery arrangements; confidentiality obligations; appropriate supervision and access management; incident-response procedures; and periodic testing and review of relevant security measures.
- 13.3. Access to personal data is limited to persons who reasonably require it for an authorised purpose.
- 13.4. All FALC Personnel remain subject to applicable duties of confidentiality and professional secrecy in relation to information received through the Firm's professional work.

14. How long we retain personal data

- 14.1. FALC retains personal data only for as long as there is a specific and legitimate reason for doing so and for a period appropriate to the purpose for which the information is processed.
- 14.2. The applicable retention period may depend upon the duration of a Client relationship or Matter; legal, regulatory and professional record-keeping obligations; AML/CFT and sanctions requirements; court, limitation and prescription periods; tax, accounting and audit requirements; professional-indemnity and risk-management requirements; the existence or reasonable possibility of a complaint, dispute, investigation or claim; and whether information is subject to a legal hold or another requirement preventing its deletion.
- 14.3. FALC maintains appropriate retention arrangements for different categories of records. When there is no longer a lawful or legitimate basis for retaining personal data, it will be securely deleted, destroyed or anonymised as appropriate.

PART D | RIGHTS, MARKETING, INCIDENTS AND COMPLAINTS

15. Your rights

- 15.1. Subject to the PDPL, the PDPL Regulation and any applicable limitations or exceptions, you may have the right to:
 - (a) withdraw consent to the processing of your personal data;
 - (b) request amendment, updating or blocking of your personal data;
 - (c) obtain a copy of personal data processed about you;
 - (d) request transfer of your personal data to another controller where FALC is legally obliged to make that transfer;

- (e) request deletion of your personal data in circumstances permitted by law; and
 - (f) be notified of a personal data breach where notification is required by applicable law.
- 15.2. You may also request that FALC cease processing the personal data concerned while a request under this section is being considered.
- 15.3. Certain rights are subject to limitations. For example, a copy provided to you must not contain personal data that identifies another person; a deletion request may be refused where retention is required by a legal obligation, judgment or court decision or where a dispute exists between FALC and the data subject; and FALC may reject a request, wholly or partly, where the request is unjustifiably repetitive or fulfilling it would require extraordinary effort, in accordance with the PDPL Regulation.

16. Exercising your rights

- 16.1. A request to exercise your rights should be submitted in writing to the Personal Data Protection Officer at hoor@falc.om.
- 16.2. Your request should, so far as reasonably possible, identify you; describe the right you wish to exercise; identify the personal data or processing concerned; and provide any information reasonably necessary for FALC to locate the relevant data and verify that the request is genuine.
- 16.3. FALC may request reasonable evidence of identity before responding to a request, particularly where disclosure of personal or confidential information is involved.
- 16.4. Requests under the applicable provisions of the PDPL Regulation will be dealt with free of charge and FALC will respond within the legally prescribed period, which is currently a maximum of 45 days from receipt of the request, subject to any lawful basis for refusal.
- 16.5. If FALC refuses a request wholly or partly, we will notify you of the reason for the refusal within the applicable period.

17. Our website and cookies

- 17.1. When you use FALC's website, we may receive technical information concerning your device, browser, IP address and use of the website.
- 17.2. Our website may use cookies or similar technologies necessary for the operation, security and functionality of the website and may use optional technologies for analytics or other purposes.
- 17.3. Where the use of a cookie or similar technology constitutes processing of personal data for which consent is required under applicable law, FALC will obtain the appropriate consent before undertaking that processing.
- 17.4. Information submitted through a website form, including enquiries or applications, will be processed for the purposes indicated when the information is collected and otherwise in accordance with this Privacy Notice.

18. Personal data breaches

- 18.1. FALC maintains procedures for identifying, investigating, containing and responding to suspected personal data breaches.
- 18.2. Where a personal data breach poses a risk to the rights of affected data subjects, FALC will notify the competent department of the Ministry of Transport, Communications and Information Technology within the period prescribed by law.
- 18.3. Where a breach is likely to result in serious harm or high risk to the affected data subject, FALC will also notify that data subject within the period prescribed by law and provide the information required under the PDPL Regulation.
- 18.4. FALC maintains appropriate records of personal data breaches and the remedial or corrective actions taken.

19. Complaints

- 19.1. If you have a question or concern concerning how FALC processes your personal data, please contact our Personal Data Protection Officer in the first instance.

- 19.2. We will seek to consider and address the matter promptly and appropriately.
- 19.3. You also have the right, subject to the requirements of the PDPL Regulation, to submit a complaint or report to the competent department of the Ministry of Transport, Communications and Information Technology if you consider that your personal data has been processed contrary to applicable data-protection law.
- 19.4. Under the current PDPL Regulation, a complaint or report to the Ministry is generally required to be submitted within 30 days from the date on which the person becomes aware of the alleged violation.

PART E | PROFESSIONAL DUTIES AND ADMINISTRATION

20. Professional duties and other legal requirements

- 20.1. As an Omani law firm, FALC is subject to legal and professional obligations concerning confidentiality, professional secrecy, conflicts, court proceedings, client verification, AML/CFT, sanctions, record keeping and cooperation with competent authorities.
- 20.2. Nothing in this Privacy Notice requires FALC to disclose information, delete records, cease processing or take another action where doing so would breach applicable law or a court or regulatory requirement; breach an applicable duty of confidentiality or professional secrecy; improperly disclose the personal data or confidential information of another person; prejudice a lawful investigation, proceeding, complaint or dispute; or otherwise be inconsistent with an applicable limitation or exception under the PDPL or PDPL Regulation.
- 20.3. Any restriction on a data subject's request will be applied only to the extent permitted by applicable law.

21. Changes to this Privacy Notice

- 21.1. FALC may review and update this Privacy Notice from time to time to reflect changes in applicable law, regulatory guidance, our services, technology or processing practices.
- 21.2. Where a proposed change materially affects the manner in which personal data already collected is processed, FALC will provide any additional notice or obtain any additional consent required by applicable law before applying the change.

22. Contact us

- 22.1. Questions concerning this Privacy Notice or FALC's handling of personal data should be directed to the Personal Data Protection Officer.
- 22.2. Personal Data Protection Officer; Faisal Al Rashdi Advocates & Legal Consultants; Office 505, Dar Al Noor, 5th Floor, Madinat Sultan Qaboos, Muscat, Sultanate of Oman; email: hoor@falc.om; telephone: 92300294