

# PRIVACY POLICY

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## 1. INTRODUCTION

At MIRA (MIRA DEVELOPMENTS) (referred to as "Company," "we," "us," or "MIRA"), we prioritize your privacy and are dedicated to safeguarding your personal information. We value you as our customer, respect your privacy, and are committed to preserving it through our adherence to this policy.

This policy outlines the sources of your personal information that we may collect from you or that you may provide to us, our reasons for collecting and processing your information, and our procedures for collecting, using, maintaining, retaining, protecting, and disclosing that information.

If you have any questions or concerns about this privacy policy or your personal information, please reach out to us using the contact details provided in the "How do you contact us?" section.

## 2. WHERE DOES YOUR PERSONAL DATA COME FROM?

The sources of your personal data (referred to collectively as "Platforms" in this policy) may include, but are not limited to, the following:

- MIRA websites: These are websites we have created and operate, including those under our own domains and web addresses (URLs), as well as micro-sites on third-party social media networks like Facebook, Twitter, or Instagram.
- Emails, text messaging services, and other electronic messages: This encompasses electronic text-based interactions between you and MIRA.
- MIRA mobile applications: These are smartphone applications created and operated by MIRA or our partners.

- MIRA customer service: Any communications between you and our customer service center (e.g., phone, chatbot, email, WhatsApp, etc.).
- Online/Offline registration forms: This includes printed or digital registrations, surveys, or questionnaires collected by MIRA through registration forms, contests, events, and promotions when you participate in our events or visit our promotional stands in malls to inquire about our properties.
- Advertising: You may interact with advertisements from us or our partners on our websites and apps, and we may receive and collect information related to these interactions.
- Data we generate: MIRA may create data about you when you use our services.
- Data from other sources: This includes data obtained from social media networks, market research agencies, MIRA's third-party sales agents, registered brokers, MIRA's promotional partners, public sources, and data received through acquisitions of other companies.

This policy does not cover information collected:

- through any other methods, including on any other websites operated by third parties; or
- by any third party, including through any applications or content (including advertisements) that may link to the Website.

### **3. WHAT INFORMATION WE COLLECT ABOUT YOU AND HOW WE USE YOUR PERSONAL INFORMATION?**

The types of personal information we collect on our platforms, the reasons for collection, and how we use this information are explained as follows:

#### **3.1 RESPONDING TO QUERIES OR EXPRESSIONS OF INTEREST:**

We use your personal data to address your queries or expressions of interest and to assist in finding the right property for your needs. We may receive your personal data through various channels:

- When you submit an enquiry through our website, social media page, phone call, or WhatsApp regarding our properties.
- When you participate in our events or visit our stands to inquire about our properties.
- When you express interest in our properties through third-party agents.
- When you visit our sales office or contact our sales advisors regarding property purchases.

The personal information we collect for this purpose includes your name, email address, phone number, nationality, and details of your enquiry, based on our legitimate business interests. In specific cases, if your enquiry relates to a service request (e.g., specific property details), we use your personal information to respond and fulfill our contractual obligations for the requested service. Additionally, when you contact our customer service center, we maintain records of communications, including call recordings, to monitor and enhance the quality of our customer support, aligning with our legitimate business interests.

### 3.2 ENTERING INTO OR CONCLUDING A SALES PURCHASE AGREEMENT:

Once you decide to proceed with purchasing a property from MIRA, we gather personal data such as name, passport details, visa information, address, national ID, and contact details to finalize contractual arrangements for property sales, facilitate property registrations, handovers, and payment arrangements. Additionally, to complete property sales, we conduct security clearances on our customers in compliance with local laws and to prevent fraudulent transactions based on our legitimate business interests.

### 3.3 REQUESTING YOUR FEEDBACK AND HANDLING COMPLAINTS:

Your satisfaction is our priority, and we take proactive steps to ensure your contentment with our services. To address your feedback or complaints, we

collect personal information including name, email address, transaction details (such as services availed), and feedback/complaints forms, post-transaction surveys, or after interactions with our customer service team. We use this information in pursuit of our legitimate business interests to address concerns and continually improve our services. If you prefer not to receive such information, you can opt out as instructed in the "How to opt out?" section.

#### 3.4 PERSONALIZING AND SHARING INFORMATION ABOUT MIRA'S SERVICES AND LATEST OFFERS:

We may combine information about you to better understand your interests and preferences and provide personalized experiences, such as notifying you about MIRA's events or sending personalized offers, discounts, or promotions via our mobile application or email (where consented). It is in our legitimate business interests to inform you about MIRA's services and latest offers. We use your personal information, such as email ID and/or contact number, to share relevant information. To opt out, follow the instructions in the "How to opt out?" section.

#### 3.5 FACILITATING EMAIL CAMPAIGNS BY OUR SALES AND MARKETING DEPARTMENTS:

In our email campaigns, we track when you receive, open, click links, or download attachments from MIRA's emails. We use this data to assess interest in our services or promotions, targeting potential customers or business partners and tailoring marketing content based on interests, in pursuit of our legitimate business interests. To opt out, follow instructions in the "How to opt out?" section.

#### 3.6 FACILITATING ADVERTISEMENTS:

MIRA uses your personal information to tailor and display advertisements, partnering with third parties to manage advertising across various channels, including social media platforms. Our partners may use cookies and non-cookie technologies based on your browsing activities and interests. To opt out, follow instructions in the "How to opt out?" section.

### 3.7 ESTABLISHING RELATIONSHIPS WITH TENANTS, THIRD-PARTY AGENTS, AND BUSINESS PARTNERS:

We collect personal information from enquiries, event participation, or professional relationships to share information about MIRA's services, tenancy opportunities, and invite to future events, aligning with legitimate business interests.

### 3.8 ENTERING INTO, RENEWING, OR FULFILLING SERVICE CONTRACTS:

We use personal information to facilitate tenancy contracts between MIRA and organizations, including passport/government ID collection for security clearance, fulfilling contractual obligations and legitimate business interests.

### 3.9 ESTABLISHING COMMERCIAL OR INVESTMENT RELATIONSHIPS:

Collecting personal information for commercial or investment relationships (e.g., shareholder agreements) to fulfill contractual obligations and legitimate business interests.

### 3.10 COMPLYING WITH LEGAL REQUIREMENTS AND LEGAL CLAIMS:

We process and retain personal information to comply with legal obligations, exercise or defend legal claims, and ensure legal and regulatory compliance.

### 3.11 PROCESSING PAYMENTS AND PREVENTING FRAUDULENT TRANSACTIONS:

We process personal information to secure payments, prevent fraud, and ensure compliance with legal obligations regarding payment reminders and legal intimations.

### 3.12 COMPLYING WITH OPT-OUT OR DO NOT DISTURB REQUESTS:

We maintain opt-out requests and necessary information to comply with preferences and enable future opt-ins.

### 3.13 COMPLYING WITH HEALTH AND SAFETY OBLIGATIONS:

Processing medical or health-related information for accident management and legal compliance in our managed facilities.

### 3.14 OTHER INFORMATION COLLECTION:

We collect statistical data automatically (e.g., browsing actions, IP addresses) to improve website services and deliver personalized experiences using technologies like cookies and web beacons.

### 3.15 INFORMATION RECEIVED FROM OTHERS:

We collaborate with third parties and collect personal information from referrals or professional networking platforms, ensuring consent for communication.

## **4. WHO MIGHT WE SHARE THIS INFORMATION WITH?**

We may share the personal information collected or provided as described in this privacy policy with the following entities:

- We may share your personal information with any member of the MIRA group, including subsidiaries, affiliates, and holding companies, to enable you to request our services, process payments, understand your preferences, conclude sales, facilitate maintenance/service requests, send you information about products and services of interest, and conduct other activities outlined in this privacy policy. These group companies are located outside the European Economic Area (“EEA”). Please refer to our website for a list of locations within our corporate group.

- We may engage carefully selected third parties to perform services on our behalf or assist us in providing services to you. For instance, third-party agents, distribution partners, cloud service providers, IT service providers, and others may be involved in supporting and facilitating property sales and bookings, property handovers, security services, brand promotions, marketing, advertising, communications, service personalization, data

analysis, and enhancement. While providing these services, these third parties may have access to your personal information.

- We may share your personal information with select business partners in banking, travel, entertainment, lifestyle, and other industries to offer special benefits to our customers. For instance, our partnerships with banks provide our customers with home financing options.
- When required or permitted by law, personal information may be disclosed to regulators and law enforcement agencies.
- In the event of a merger, divestiture, restructuring, reorganization, dissolution, or sale or transfer of some or all of the Company's assets, personal information held by the Company about our Website users may be shared with a buyer or other successor, whether as a going concern or as part of bankruptcy, liquidation, or similar proceedings.
- Personal information may be shared with government or regulatory authorities upon request to comply with court orders, laws, or legal processes.
- Personal information may be shared with other companies and organizations for fraud protection and credit risk reduction if disclosure is deemed necessary to protect the rights, property, or safety of the Company, our customers, or others.

The personal information we collect from you may be transferred to and stored at destinations outside the EEA (e.g., in Dubai) and may be processed by staff operating outside the EEA who work for us or our third-party vendors. We will take all reasonable steps to ensure that your personal information is treated securely and in accordance with this privacy policy and applicable data protection laws. This includes entering into EU standard contractual clauses (or equivalent measures) with parties outside the EEA who receive personal information from us. We carry out such transfers to fulfill our contractual obligations and pursue legitimate business interests in better serving you. Adequate safeguards have been implemented to protect and secure the information involved in these transfers.

For more information on protection measures and transfer mechanisms, please contact us using the details provided in the "How do you contact us?" section.

## **5. HOW LONG DO WE KEEP INFORMATION ABOUT YOU?**

We will retain your personal information only for as long as reasonably necessary to address queries, resolve issues, fulfill purposes outlined above, or comply with legal requirements under applicable law(s). This means that we may keep your personal information for a reasonable period, such as until the end of a leasing contract with the organization you represent or after your query has been resolved. In certain cases, we may retain your personal information for a longer period if extended retention is required by law or regulation, or to establish, exercise, or defend legal rights. When no longer needed, we will ensure secure disposal of your personal information.

For details on where and how long your personal information is stored, as well as information on your rights regarding erasure and portability, please contact us using the details provided in the "How do you contact us?" section.

## **6. HOW SECURE IS YOUR INFORMATION?**

Ensuring the security of your personal data is a top priority for us. We take great care in securely transmitting your personal information from your devices to our servers. Industry-standard security measures, such as firewalls and Transport Layer Security (TLS), are employed to safeguard the confidentiality of your information and ensure its security.

We have established and maintain appropriate technical and organizational security measures, policies, and procedures to protect your personal information from accidental loss, unauthorized access, use, alteration, and disclosure. All information you provide is stored on secure servers behind firewalls, and all payment transactions are encrypted using TLS technology. Examples of measures we implement include:



- Imposing confidentiality requirements on our staff and service providers.
- Restricting access to your personal information to employees and third parties strictly on a need-to-know basis (e.g., to respond to your inquiries or requests).
- Destroying or anonymizing personal information that is no longer needed for its original purposes.
- Using secure communication channels for transmitting personal data.

The security of your information also relies on you. If you have a password to access certain parts of our website, it's important to keep this password confidential and not share it with others.

While we strive to protect your personal information, please be aware that transmitting information over the internet is not entirely secure. Despite our efforts, we cannot guarantee the security of information transmitted to our website. Any transmission of personal information is done at your own risk. We are not responsible for the circumvention of any privacy settings or security measures on our website.

## **7. WHAT ARE YOUR RIGHTS?**

If you are covered by laws that grant you such rights, you may have certain entitlements regarding your personal information as outlined below. To exercise these rights, we may request additional information to verify your identity and for security purposes before disclosing personal information to you. We reserve the right to charge a fee where permitted by law, for instance, if your request is deemed manifestly unfounded or excessive.

To exercise any of these rights, please contact us via email at (info@miradevelopments.ae)

### **THE RIGHT TO ACCESS**

You have the right to confirm whether we process your personal data, obtain a copy of your personal data held by us, and receive certain other

information about how and why we process your personal data (similar to the information provided in this privacy statement).

### THE RIGHT TO RECTIFICATION

You have the right to request amendments to your personal data if it is inaccurate (e.g., if you change your name or address) and to have incomplete personal data completed.

### THE RIGHT TO RESTRICT PROCESSING OF PERSONAL DATA

You have the right to limit our processing of your personal data in the following circumstances:

- Temporarily when you dispute the accuracy of the personal data,
- Temporarily when you object to a legitimate interest identified by us,
- When your personal data has been unlawfully processed and you request restriction of processing instead of deletion,
- When the personal data is no longer necessary for the purposes for which it was collected and processed, but you require the data to establish, exercise, or defend legal claims.

We may continue to use your personal information following a request for restriction if:

- We have your consent,
- It is necessary to establish, exercise, or defend legal claims, or
- It is necessary to protect the rights of another natural or legal person.

### THE RIGHT TO ERASURE ('THE RIGHT TO BE FORGOTTEN')

You have the right to have your personal data deleted in the following circumstances:

- When the personal data is no longer necessary for the purposes for which it was collected and processed,

- When our legal basis for processing is consent, and you withdraw consent with no other legal basis for processing,
- When our legal basis for processing is our legitimate interest, and you object to our processing with no overriding legitimate grounds,
- When you object to our processing for direct marketing purposes,
- When your personal data has been unlawfully processed,
- When your personal data must be erased to comply with a legal obligation under EEA law.

We are not required to comply with your request to erase personal information if:

- Processing of your personal information is necessary for compliance with a legal obligation, or
- Processing is necessary to establish, exercise, or defend legal claims.

#### THE RIGHT TO OBJECT TO THE PROCESSING OF PERSONAL DATA

You have the right to object to our processing of your personal data in the following situations:

- When our legal basis for processing is our legitimate interest pursued by us, including processing for direct marketing purposes.

#### THE RIGHT TO DATA PORTABILITY

You have the right to receive your personal data provided to us and to transmit this data to another organization (or have us transmit it if technically feasible) where our legal basis for processing the personal data is consent or necessary for the performance of our contract with you, and the processing is carried out by automated means.

#### THE RIGHT TO WITHDRAW CONSENT AT ANY TIME (WHERE PROCESSING IS BASED ON CONSENT)

If we process personal data based on consent, individuals have the right to withdraw consent at any time.

## THE RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

If you are dissatisfied with how we handle your personal information, you can file a complaint with a supervisory authority in your country of residence, place of work, or where an alleged infringement of data protection law within the EEA has occurred. We sincerely hope you will never need to do this, but if you wish to complain about our use of personal data, you can contact us using the methods outlined in the "How do you contact us?" section. We will investigate and respond to any complaints received.

## **8. UPDATES ON POLICY**

This policy may change from time to time. Your continued use of our platforms after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

## **9. HOW DO YOU CONTACT US?**

In case of any queries related to this policy, you can contact us in one of the following ways.

1. [info@miradevelopments.ae](mailto:info@miradevelopments.ae)
2. +9714 887 7283