

# Privacy Statement

**Nasco (or We)** strongly believes in protecting the privacy of the visitors and users (**Users or You**) of our website (the **Website**) or applications (the **Applications**).

This privacy statement (the **Statement**) is intended to inform the Users of the ways in which Nasco collects personal information, the uses to which that information will be put, and the ways in which Nasco will protect any personal information the Users choose to provide via the Website or the Applications. Generally, personal information (the **Personal Information**) is any information that can be used to identify the User, or his activity on the Website or through services offered thereon.

This Statement applies to data collected via the Website or other Applications (unless such Applications already provide their own privacy statement and terms of use) – mainly :

Nasco Connect Individual Portal: <https://portal.nascoconnect.com/retailPortal>

Nasco Connect Corporate Portal: <https://nascoconnect.com/portal>

Nasco Connect Digital Insurance App for IOS: <https://apps.apple.com/ae/app/nasco-connect/id1592056306>

Nasco Connect Digital Insurance App for Android: [https://play.google.com/store/apps/details?id=com.nasco\\_mobile\\_app](https://play.google.com/store/apps/details?id=com.nasco_mobile_app)

There may be additional information that might be collected by Nasco about the User or the User's company, pursuant to other relationships or for other purposes; such collection will be subject to other agreements and rules.

The present Statement is subject to the provisions of the Data Privacy Laws in the countries we operate.

## Personal Information We collect

The Personal Information collected from You will vary depending on which products or services You engage us to provide through the Website or the Applications.

The Personal Information We collect might include but would not be limited to the following:

- **Personal data of the User and his/her family members**, such as first and last name, marital status, proof of identification (passport or local ID), email address, postal address, phone number, and other similar contact data, date and place of birth, gender, nationality, and family members related data;
- **Business contact information** such as employer name, job function, job title, department, employer size and locations and tax residency;
- **Contractual information** such as any information allowing us to perform our contractual duties and insurance brokerage services; and
- **Technical information** about your device for security purposes such as your IP address or operating system.

## **Collection of sensitive Personal Data**

Sensitive personal data means “any data that directly or indirectly reveals a natural person’s family, racial origin, political or philosophical opinions, religious beliefs, criminal records, biometric data or any data related to the health of such person, such as his/her physical, psychological, mental, generic, or sexual condition, including information related to health care services provided thereto that reveals his/her health status.

We do not collect any personal health information or other sensitive personal data from your or from third parties providers through the Website. We may collect such sensitive personal data where we intend to, or have already, entered into a legally binding contractual relationship and the collection is required in order to be able to perform or render a legal obligation that we owe to you under that contract.

We may collect sensitive Personal Data with respect to the Applications that we make available, however we will ensure to receive your consent prior to collection of the said personal data and will provide you with a copy of our privacy statement upon your request.

## **How we collect Personal Information**

The Personal Information collected by Nasco through the Website or Applications falls into two categories: (1) information voluntarily supplied by the Users and (2) information gathered via automated means as the Users navigate through the Website.

### **1. Information voluntarily provided by the User**

You may choose to provide us with information to help us serve your needs. Although it is optional for You to disclose the requested information, You must do so in order to engage in certain activities on the Website or in case You need to maintain a relationship with us. Any Personal Information You send us will be used only for the purpose indicated on the Website or in this Statement. If You send us information You explicitly consent to storage, destruction, processing, disclosure, and/or any other use of your information by Nasco or its third-party service providers.

### **1. Information Collected by our Website and Cookies:**

We may use the IP address information of your device, without collecting your Personal Information, to monitor and analyze how our Website is being used.

We may also collect specific information when You navigate on the Website for the purpose of enhancing the Users experience and track Users activities on the Website, such as dialogue flow and Google Analytics.

We may also acquire certain information about You from a "cookie" and/or from your IP/Internet address. Cookies are small pieces of information that are stored by your web browser on your computer's hard drive that enable us to serve You faster and more efficiently. Please refer to our **cookies policy** for further information on what cookies are being used for and for what purpose.

## **Children**

Nasco understands the importance of protecting children’s privacy, especially in an online environment.

Our Website or Applications are not intentionally designed for, or directed at children under the age of 18. It is our policy never to knowingly keep Personal Information about any User under the age of 18, except as part of an engagement to provide professional services (and provided appropriate consents from the concerned subject and his legal guardian are obtained).

### **The use of the collected Personal Information**

Nasco will use the information provided by You through the Website to serve your needs and for the purposes stated herein. The Personal Information may be used for example to answer queries in relation to a quotation or to any service offered by Nasco, to help resolve a complaint or to share any information, written materials or updates in response to your requests.

### **Sharing of Personal Information**

We will not sell, exchange, or otherwise distribute your Personal Information without your consent, except to the extent required by law, or in accordance with your instructions, or as identified in this Statement. However, we may share your Personal Information with the following parties in order to serve your needs and/or to enable us to comply with legal obligations:

- **Affiliates:** Our affiliates to enable them to (1) provide services to You as requested by You, (2) to contact You regarding additional products and services in which You have expressed an interest.
- **Agents and Service Providers.** We sometimes contract with other companies and individuals to perform functions or provide services for us or on our behalf. They may have access to Personal Information, as needed to perform their functions, but are contractually restricted from sharing it externally or using it for purposes other than providing services for Nasco or on our behalf.
- **Legal Matters.** Nasco may preserve, and has the right to disclose, any information about You or your use of the Website without your prior permission if Nasco has a good faith belief that such action is necessary to: (a) protect and defend the rights, property, or safety of Nasco or its affiliates, other users of the Website, or the public; (b) enforce the terms and conditions that apply to use of the Website; (c) respond to claims that any content violates the rights of third parties; (d) respond to claims of suspected or actual illegal activity; (e) respond to an audit or investigate a complaint or security threat; or (f) comply with applicable law, regulation, legal process, or governmental requests.

### **Retention of Personal Information**

We will collect and retain your Personal Information for as long as it is necessary for the purpose or purposes for which the collection was intended:

- For the purposes of performing or fulfilling a contractual obligation with You or the organization that You represent or in order to provide You with requested services,
- To comply with our own legal requirements; and
- For as long as required or permitted by law.

### **Updates to Personal Information**

Keeping your information up to date and accurate is important to us. We commit to regularly review and correct where necessary, the information that we hold about You. If any of your information changes, please email or write to us, or call us using the contact information noted below. You have the right to ask for a copy of the information we hold about You and/or ask for deletion of all Personal Information we hold (except that we may keep copies of such information if that is needed in order to meet our retention requirements).

As we want to make sure that your Personal Information is accurate, complete and up to date.

You may ask us to correct any Personal Information about You if You believe that it is considered by You incomplete, inaccurate or obsolete.

### **Measures in place to protect your Personal Information**

The confidentiality and security of your Personal Information is important to us. We have implemented reasonable physical, technical and administrative security standards to protect Personal Information from loss, misuse, alteration or destruction.

We protect your Personal Information against unauthorized access, use or disclosure, using security technologies and procedures. Only authorized individuals who are subject to continuous training on protection of Personal Information, will access your Personal Information.

Our service providers and agents are contractually bound to maintain the confidentiality of Personal Information and may not use the information for any unauthorized purpose.

### **Your Rights**

You have the right to see or access the personal information we hold about you. To receive a copy, please send us an email at [Compliance@nascodirect.com](mailto:Compliance@nascodirect.com)

In addition, you have certain rights regarding your personal information, subject to local law. These include the following rights to:

- rectify the information we hold about you;
- erase your personal information;
- restrict our use of your personal information;
- object to our use of your personal information;
- withdraw any consents you have provided for our use of your personal information;
- receive your personal information in a usable electronic format and transmit it to a third party (right to data portability); and
- lodge a complaint with your local data protection authority.

If you would like to discuss or exercise such rights, please contact us at the details below.

If you are concerned that any of the information we hold about you is incorrect, or out of date, please write to the address above to report your concerns and we will take appropriate steps to amend our records.

Please note that we will likely require additional information from you to honor your requests.

## Privacy Complaints

If you have any concerns or complaints about our compliance with applicable privacy laws or this Privacy Policy, please send us an email at [Compliance@nascodirect.com](mailto:Compliance@nascodirect.com)

We will endeavor to respond to your concerns as soon as possible.

## Changes to Privacy Statement

The Statement is subject to change at any time. It was adopted on December 22, 2022

Any changes we make to this Statement become effective immediately when we post the revised Statement on the Website. We recommend that You review this Statement regularly to be informed of any changes.

## Cookies Policy

Last Updated: December 22, 2022

**Important Notice:** this policy explains how cookies are used on our internet-facing applications. The policy may be amended from time to time. When we do, we will let you know by appropriate means such by posting the revised policy on the page with a new “Last Updated” date.

### What are cookies?

Cookies are small, simple text files downloaded to your computer, tablet, smartphone or other device when a user visits an internet-facing application. Cookies are mainly used to identify users when they return back to a previously visited internet-facing application to remember their login information (if that features of login is enabled on the Website) and behavior.

### Our use of cookies

We use cookies on our internet-facing applications to improve our users' navigation experience. This can include which pages they have visited, choices they have made from menus, any specific information they have entered into forms and the time and date of their visit.

**It is important to highlight that the cookies we use do not store sensitive or personal information.** You can choose to refuse the cookies at any time; but in this case, our internet-facing application may not function properly.

### Type of cookies

There are different types of cookies that we use on our internet-facing applications:

- Necessary cookies that are basic cookies that ensure the internet-facing application work properly, for example by controlling the way it is displayed on your computer or tablet, smartphone or other device. Our internet-facing applications don't function properly without these cookies.
- Preferences cookies that are Personal cookies that save preferences such as the language you choose to use.
- Statistics cookies that are third party cookies, are set by other content providers outside of Nasco and are used to analyze your use of their content. Google Analytics is one example.

When all cookies are enabled, our Website will provide you the best user experience.

**Cookies Management**

**How can I refuse cookies and what happens if I switch cookies off?**

Cookies can be turned off in your browser's 'internet options' which allows you to refuse the setting of cookies. If you select this setting, we cannot save your settings (when that features is enabled on the Website); thereafter, you will be asked about cookies consent each time you visit our website.

**What Specific cookies we use on our facing-internet applications and for what purposes?**

Corporate Website:

Name	Type	Link	What it does
Google Analytics	Analytical Cookies	<a href="https://support.google.com/analytics/answer/12159447?hl=en">https://support.google.com/analytics/answer/12159447?hl=en</a> <a href="https://support.google.com/analytics/answer/6004245">https://support.google.com/analytics/answer/6004245</a> <a href="https://policies.google.com/technologies/partner-sites">https://policies.google.com/technologies/partner-sites</a>	Google Analytics is used to collect data from our websites and apps to create reports that provide insights into how visitors interact on our pages.