

# Sovereign Corporate Services Ltd Privacy Notice

## 1. Purpose of this privacy notice

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it in order to provide company formation and other incidental services, such as payroll, HR and corporate secretarial services to you (the “Services”). This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the ‘How to contact us’ section.

## 2. What is Personal Data?

Personal Data means any information referring to an identified or identifiable natural person (“Data Subject”). A person is identifiable if he or she can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person..

Special Category Personal Data means Personal Data revealing or concerning a person’s racial or ethnic origin, communal origin, political opinions, religious or philosophical beliefs, criminal record, trade-union membership, health (including mental or genetic health), sexual orientation, or any biometric or genetic data uniquely identifying that person.

Sovereign does not ordinarily collect or process Special Category Personal Data, unless such processing is:

- (a) required for the performance of our legal or regulatory obligations under DIFC or applicable laws; or
- (b) expressly consented to by you.

We ensure that all Personal Data collected is limited to what is necessary in relation to the purposes for which it is processed, in line with the data-minimisation principle. The categories of Personal Data we collect and the lawful bases for processing are outlined in the section below titled “Purposes, Lawful Bases and Retention Periods.”

## 3. How we collect your Personal Data

We collect most Personal Data directly from you, including through in-person meetings, telephone calls, and any information exchanged via electronic communications such as email, text message, or private or business-related messaging applications (for example, WhatsApp or Teams). We may also collect Personal Data when you interact with our websites, online portals, or forms hosted within the Dubai International Financial Centre (DIFC).

Where permitted under the DIFC Data Protection Law, we may obtain limited Personal Data from other sources, such as public registers, government authorities, regulators, or other entities within the Sovereign Group, but only where such collection is lawful, proportionate, and necessary for the purposes described in this Privacy Notice.

All Personal Data is collected and processed in accordance with the principles set out in the DIFC Data Protection Law, including lawfulness, fairness, transparency, purpose limitation, and data minimisation.

#### **4. Purposes, lawful bases and retention periods**

We will only process your Personal Data where there is a lawful basis under the DIFC DP Law. Most commonly, we will process Personal Data:

- (a) to comply with a Legal Obligation imposed under DIFC, UAE Federal, or international laws applicable to our business;
- (b) where the processing is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract;
- (c) where processing is necessary for the purposes of our legitimate interests, provided such interests are not overridden by your rights and interests; or
- (d) where you have provided your explicit consent for a specific purpose.

We ensure that all processing activities are limited to what is necessary for the stated purposes below. Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.



Categories of individuals	Categories of Personal Data	Purpose of Processing	Lawful Basis	Retention Period
<p><b>Client</b></p>	<p>A. Identity information - Name, nationality, date of birth.</p>	<p>To be able to identify you as a unique individual and to facilitate the starting of the business relationship.</p>	<p>Legal Obligation (Art 10(1)(d)) and Contract (Art 10(1)(b)).</p>	<p>Normally retained for 5–10 years after the end of the relevant engagement, subject to DIFC and other regulatory record-keeping requirements.</p>
	<p>B. Contact information – Your home address, phone number, email address and your residency status in the UAE (if applicable)</p>	<p>To be able to contact you in relation to the Services and provide updates, newsletters, updates to the local law. Furthermore, we are required to request and maintain this information to satisfy the Know Your Client (KYC) requirements.</p>	<p>Legal Obligation (Art 10(1)(d)).</p>	
	<p>C. Employment information – Your employer’s details i.e. name and address, your business establishment’s name and email address.</p>	<p>We are required to request and maintain this information to satisfy the Know Your Client (KYC) requirements.</p>	<p>Legal Obligation (Art 10(1)(d)).</p>	
	<p>D. Commercial information – Sources of income and your record of investments.</p>	<p>We are required to request and maintain this information to satisfy the Know Your Client (KYC) requirements.</p>	<p>Legal Obligation (Art 10(1)(d)) and Legitimate Interest (Art 10(1)(f)).</p>	
	<p>E. Financial information – your salary with the benefits and allowances and your bank account details.</p>	<p>We are required to request and maintain this information to satisfy the Know Your Client (KYC) requirements.</p>	<p>Legal Obligation (Art 10(1)(d)) and Legitimate Interest (Art 10(1)(f)).</p>	

## 5. Sharing your Personal Data & International Transfers

In the course of providing you with our products or services, we may need to share your Personal Data with third parties, but only where such sharing is lawful, proportionate, and necessary for the relevant purpose in accordance with the DIFC Data Protection Law.:

- a) Affiliates and Group Entities – other entities within the Sovereign Group, where necessary to perform our contractual obligations, manage client relationships, or comply with applicable legal or regulatory requirements.
- b) Service Providers and Professional Advisers – third parties engaged by us to support service delivery, including translators, consultants, auditors, IT providers, and other professional advisers. These third parties act as our Processors and are bound by written agreements ensuring confidentiality and compliance with the DIFC Data Protection Law.
- c) Regulators, Authorities, and Screening Platforms – where required by law, we may disclose Personal Data to government authorities, financial institutions, credit reference agencies, anti-money-laundering (“AML”) and sanctions-screening providers, and other regulatory bodies for the purposes of client due diligence, fraud prevention, or crime detection.

Where we transfer or make Personal Data accessible outside the DIFC, we do so only:

- a) to jurisdictions that the Commissioner of Data Protection has determined to provide an adequate level of protection
- b) pursuant to appropriate safeguards such as contractual clauses, binding corporate rules or your explicit consent.

We take reasonable steps to ensure that all recipients of Personal Data maintain appropriate technical and organisational measures to protect it against unauthorised or unlawful processing and accidental loss, destruction, or damage, as required by Article 30 of the DIFC DP Law

## 6. Retention

We have implemented robust IT management systems, such as One Viewpoint, to ensure the security of our data. These systems adhere to recognised standards and are operated in line with recognised international standards and the requirements of the DIFC Data Protection Law, providing a comprehensive framework for safeguarding information and maintaining a secure operational environment to protect personal information from loss, misuse, alteration or destruction.

We will retain your personal data for as long as is necessary, and specifically in accordance with the table set out above, to provide the Services which you have requested from us.

It is our normal practice to retain documents relating to our engagement as prescribed in the local regulations (which is five (5) years) from the end of the relevant Service. However, we may need to retain some records for a longer period where this is required for us to be able to comply with our legal obligations (including to satisfy any legal, regulatory, or contractual obligations, or to establish, exercise, or defend legal claims).

We may also need to retain your personal data for a longer period where this is required in relation to legal claims, although this is rare.

Where continued retention is no longer required, we securely erase or anonymise Personal Data so that it can no longer be associated with you. Anonymised information that no longer constitutes Personal Data may be retained and used for legitimate business or statistical purposes.

## 7. Your rights and how to exercise them

You have certain rights in relation to the processing of your Personal Data, including to:

- **Right to be informed**

You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.

- **Right of access** (commonly known as a “Subject Access Request”)

You have the right to receive a copy of the Personal Data we hold about you.

- **Right to rectification**

You have the right to have any incomplete or inaccurate information we hold about you corrected.

- **Right to erasure** (commonly known as the right to be forgotten)

You have the right to ask us to delete your Personal Data.

- **Right to object to processing**

You have the right to object to us processing your Personal Data.

- **Right to restrict processing**

You have the right to restrict our use of your Personal Data.

- **Right to portability**

You have the right to ask us to transfer your Personal Data to another party.

- **Automated decision-making**

You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.

- **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the processing of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis or legal requirement for doing so.

- **Right to lodge a complaint**

You have the right to lodge a complaint with the relevant supervisory authority, if you are concerned about the way in which we are handling your Personal Data. In line with the DIFC DP Law, you have the right to raise a complaint with:

**Commissioner of Data Protection**

Dubai International Financial Centre Authority

Level 14, The Gate Building, DIFC, Dubai, UAE

Email: [commissioner@difc.ae](mailto:commissioner@difc.ae)

Website: [www.difc.ae/data-protection](http://www.difc.ae/data-protection)

### **How to exercise your rights**

If you wish to exercise your rights, you may contact us using the details set out below within the section called ‘How to contact us and our Data Protection Officer’. We may need to request specific information to verify your identity before acting on your request. Once verified, we will respond without undue delay and within one (1) month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

## **8. Your rights and how to exercise them**

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please contact our Data Protection Officer at [dpo@Sovereigngroup.com](mailto:dpo@Sovereigngroup.com)

## **9. Changes to this privacy notice**

Sovereign CSP Ltd keeps this privacy notice under regular review. We will inform you of any substantial change in how we process your personal data which will be updated on Sovereign’s web page.

This Privacy Notice was last updated on 22<sup>nd</sup> October 2025.