

Personal Data Protection Policy

Introduction

For the purposes of this policy, “**Asuria**”, “**Company**”, “**we**”, “**our**” and “**us**” refer to Asuria People Business Services, Commercial Registration Number (1010818183) dated 11/08/1444H, with its head office at The Esplanade, Prince Turki Al Awal Rd, Al Mohammadiyah District, Riyadh. 4567, PO Box 12371, Saudi Arabia.

The “**website**” refers to the website at www.asuria.com.sa and “**you**” and “**your**” refers to a specific user accessing our website.

In the course of doing business, there may be circumstances where Asuria collects personal data in order to enable you to participate in our services or programs. Personal data is information that relates to you or allows us to identify you. This includes information such as your name, address and telephone number, but can also include information such as analysis of your use of our website.

This policy has been developed to ensure that such information is handled and protected appropriately and in accordance with the Personal Data Protection Law implemented by Royal Decree M/19 of 9/2/1443H (16 September 2021) approving Resolution No. 98 dated 7/2/1443H (14 September 2021), as amended by Royal Decree No. M147 of 5/9/1444H (corresponding to 27 March 2023) (“**PDPL**”), the Implementing Regulations of the PDPL (“**Regulations**”) and the Regulations on Personal Data Transfer outside the Kingdom of Saudi Arabia (“**Data Transfer Regulations**”) (together known as “**Applicable Laws**”).

We will process your personal data obtained via the Website in our capacity as a *controller*. This means that we are responsible for ensuring that we comply with relevant Applicable Laws when processing your personal data. In some cases, we may also act as a data processor.

This Policy sets out the broad controls that have been adopted to govern the way we collect and use personal data, the circumstances under which we may disclose personal data to third parties, how personal data held may be accessed, and what to do if concerned with the treatment of your personal data.

Scope

1.1 Who does this policy apply to?

This policy applies to any individuals whose personal data we may hold or collect including:

- employees
- contractors, consultants or suppliers of goods or services
- participants in programs or services delivered by us
- a person whose information may be given to us by a third party
- a person seeking employment with us, and/or

- users of our website.

The Company will be fair and open about the way we collect information about you and what we intend to do with the information we collect.

1.2 Purpose of this policy

The purpose of this policy is to:

- describe the types of personal data that we collect, hold, use and disclose
- outline our information handling procedures
- explain our authority to collect your personal data, why it may be held by us, how it is used and how it is protected
- explain our procedures in the event that your personal data is disclosed without authorisation, and
- provide information about how to access your personal data, correct it if necessary and complain if you believe it has been wrongly collected or inappropriately handled.

Legal basis

The Company processes your personal data on the following bases, where available under applicable data protection laws:

- because you have given your consent (if we expressly ask for consent to process your personal data, for a specific purpose); or
- for our legitimate interests, to the extent that it does not affect your rights and where the data does not include sensitive data (as defined under the PDPL). This requires us to carry out an assessment by understanding what you may reasonably expect from the processing and balance your rights and interests. Using your personal data helps us to operate, improve and minimise any disruption to our website; or
- to comply with legal, regulatory and risk management obligations or fulfil our obligations under an agreement that we have executed with you.

We will not, without obtaining your consent, process your personal data in a manner that is inconsistent with the purpose for which we have collected the personal data or the basis on which we have relied to collect your personal data, and will strive to process your personal data in a manner compliant with the PDPL.

If you fail to provide certain information when requested, we may not be able to provide you with information about our services and products.

Information we collect

The Company collects personal data in a variety of ways in the course of running our business, including:

- providing services to Jobseekers, trainees and other parties
- use of phone or fax
- engaging suppliers, contractors, labour hire workers and other personnel
- responding to questions about our services and our business
- responding to complaints and enquiries via our online complaints process
- interacting with people via our website or via social media and related platforms
- conducting trade promotions and information sessions, and
- via security processes at our sites including our sign in registers.

The kinds of personal data that the Company collects and holds depends on the circumstances, but can include;

- contact information – names, address, email address, telephone number
- employment and education history
- language proficiencies and other work-related skills
- Social Security number, national identifier or other government-issued identification number
- date of birth
- gender
- bank account information
- citizenship and work authorisation status
- benefits information
- tax-related information
- information provided by references, and/or
- information in your resume.

The personal data that we collect from or about you is mandatory, unless otherwise indicated.

Means of collection

The Company collects most personal data directly from the person, unless the person consents to the collection of information by someone else other than them, or the Company is required or authorized under Applicable Laws, or a court/tribunal order, to collect the information from someone other than the individual. Third parties may also share information with us about people, including Government agencies and other related parties. Where reasonable and practicable, the Company will collect personal data directly from you and inform you that this is being done.

When the Company collects personal data, the Company will take reasonable steps to ensure that the person is aware of:

- the collection
- the purpose of the collection
- the main consequences (if any) if the information is not collected
- the types of organisations (if any) to which the information may be disclosed (including those located overseas)
- any law that required the particular information to be collected, and
- the fact that this Policy contains details on access, correction and complaint.

Personal data collected by the Company is held in a variety of formats including hardcopy and on our computer systems.

How we use the information we collect

The Company only processes your personal data as strictly necessary for the Company to perform the services that are requested of the Company, that is otherwise reasonably necessary for business activities or if required by law. The Company will not process sensitive data unless there is a purpose for this collection and the person to whom it relates provides explicit consent to the collection. The exception to this is where collection is required or authorised by law, in implementation of a previous agreement that we have executed with you, or another permitted exception under law applies.

Retention

The Company stores personal data in archive systems for a period the Company considers reasonable depending on the primary purpose for which the information was collected. We will keep your personal data only for as long as is necessary to respond to any queries or complaints, to improve our website or to comply with any legal obligations to which we may be subject.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve such purposes through other means, and the applicable legal requirements.

Personal data will be de-identified or destroyed when it is no longer required such that it cannot be re-identified at a later date, unless we have a lawful basis under Applicable Laws to retain your personal data for longer durations.

Cookies

The Company uses 'cookies' and other similar technologies in electronic communications to help us collect information about the way you interact with our content online and help the Company to improve your experience when visiting the Company website.

Cookies are data files that your browser places on your computer or device. They remember the type of browser that the visitor is using and which additional browser software the user has installed. They remember preferences such as languages and region, which remain as your default settings when you next revisit the website. The cookies also allow the user to rate pages and fill in comment forms on the website.

Cookies cannot collect any information stored on your computer or files.

Users can visit www.allaboutcookies.org for more information and details on how to delete or reject cookies.

Google analytics

The Company uses Google Analytics to collect information about how people use our website. Google Analytics does this by using cookies to understand the types of websites you visit and the way you interact with those websites. The information the Company obtains from Google Analytics helps us understand user needs and offer a better user experience.

By using the Asuria website, you consent to the processing of data about you by Google in the manner described in Google's Privacy Policy which is available at: <http://google.com/intl/en/policies/privacy>. You can opt out of Google Analytics by using the Google Analytics opt-out browser add-on.

Further information is available at: <https://tools.google.com/dlpage/gaoptout>

Use or disclosure of personal data

The use to which the Company can put personal data depends on the reason for which it was collected. The Company may use personal data for its primary purpose of

collecting the data, or for a related secondary purpose that we could reasonably be expected to use the personal data for.

The Company respects the privacy of personal data and will take reasonable steps to keep it strictly confidential.

The Company will disclose personal data to third parties if it is necessary for the primary purpose of collecting the information, or for a related secondary purpose, if the disclosure could be reasonably expected such as:

- with our subsidiaries and affiliates
- if you are a job seeker or employer seeking to recruit, and
- with organisations and consultants helping us to find you a job
- with Training Institutes providing upskilling and certification support programs
- with Government entities contracting with our services

We will share your personal data with our Alliance partner, [Sawaeed for Business Services], acting in capacity as processor/joint controller for the purpose of delivering joint services to our customers/clients.

Where such disclosure is necessary, the Company will require that the third party undertake to treat the personal data in accordance with the legislative requirements, subject to the fulfilment of the relevant conditions and in compliance with our obligations under the PDPL.

The Company will only disclose personal data to third parties without the consent of the person to whom the information relates if the disclosure is:

- necessary to protect or enforce Asuria's rights or interests or to defend any claims, provided that no sensitive data will be processed
- necessary to protect public health or safety, or prevent or lessen a serious threat to a person's health or safety, or
- otherwise permitted under Applicable Laws.

Countries to which we transfer your personal data

Under certain circumstances, we may have to transfer your personal data outside the country where you are residing, and personal data may be transferred to countries which do not have data protection laws or to countries where your privacy will not be protected as extensively.

If you are a KSA resident, when we transfer your data to third parties based outside the KSA, we will do so in compliance with the requirements set out in the KSA PDPL, Implementing Regulations and Data Transfer Regulations.

We will also strive to implement appropriate measures to ensure that your personal data remains protected and secure while and for as long as it remains under our control.

Direct marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We will only use personal data that we obtained directly from you for marketing purposes and will obtain your consent before using your personal data to send

marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

Under no circumstances shall the Company sell personal data.

Information security

The Company will take all reasonable steps to ensure that all personal data held by the Company is secure from any unauthorised access or disclosure. Only properly authorised people who have a need to access personal data to perform their job will be able to see or use that information, including employees, agents, contractors and other third parties. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

The Company will ensure that its employees receive training about the management of personal data relevant to their respective roles and responsibilities in accordance with the Company's Information Security Policy.

We maintain administrative, technical and physical safeguards designed to protect the personal data you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Your rights as a data subject

When permitted by Applicable Law, a data subject can exercise under Articles 4, 5 and 34 of the PDPL the following specific rights.

- Right to be informed: A data subject has the right to be informed about the legal basis for the collection of his or her data.
- Right of access: A data subject has the right to access his or her personal data in order to verify that his or her personal data is processed in accordance with the law.
- Right to rectification: A data subject has the right to request the rectification of any inaccurate or incomplete data held about him or her.
- Right to deletion: A data subject has the right to request that the Data Controller deletes information about him or her and to no longer process that data.
- Right to data portability: The data subject has the right to request the data portability meaning that the data subject can receive the originally provided personal data in a readable and clear structured and commonly used format or that the data subject can request the transfer of the data to another data controller.

Whenever the processing is based on the consent, as under art.5 of the PDPL, the data subject may withdraw their consent at any time. There may be circumstances where we will still need to process your data for legal or official reasons. We will inform you if this is the case. Where this is the case, we will restrict the data to only what is necessary for the purpose of meeting those specific requirements.

If you require more information about the processing of your personal data, please refer to the [How to Contact Us](#) section below.

Contact the Data Protection Officer

Questions regarding Asuria's privacy and data protection are answered by our Data Protection Officer: dataprotectionofficer@asuria.com.sa.

Dealing with data subject requests

Subject to any overriding legal obligations, requirements and/or exemptions, the Asuria Data Protection Officer, or delegate of the Company, will endeavour to respond to data subject requests within 30 days after the request is made, in compliance with Applicable Laws, unless we require further information from you.

We may extend this period if the implementation of the request requires an unexpected or unusual additional effort, or if we receive multiple requests from you. If we extend the period for issuing our response to any request that we receive from you, we will notify you in advance of the extension.

We may ask you to provide proof of your identity.

Refusal of data subject requests

If the request does not fulfil the conditions under Applicable Laws, or is repetitive, manifestly unfounded, or requires disproportionate efforts, we reserve the right to refuse it, in which case we will notify you of the refusal and the reason behind it. This may include:

- the reasons for the refusal, except to the extent that, having regard to the grounds for the refusal, it would be reasonable to do so
- the mechanisms available to complain about the refusal, and
- any other matter prescribed by Applicable Laws.

Hyperlinks

Our website may provide links to third party websites for your convenience. If you access those links, you will leave our website. We do not control those websites or their privacy practices, which may differ from ours.

This policy does not cover the personal data you choose to give to unrelated third parties. We encourage you to review the policy of any company before submitting your personal data. Some third-party companies may choose to share personal data with us; that sharing is governed by that third party company's policy.

Updates to this policy

The Company may make changes to this policy from time to time, without notice, via the uploading of an updated version of the policy on the Company website at www.asuria.com.sa.

How to contact us

If you have any questions or comments about this policy or wish to complain about any breach by the Company of this policy a complaint may be lodged in writing by email to the address provided, addressed to the Asuria Data Protection Officer.

E: dataprotectionofficer@asuria.com.sa

If the Company is unable to resolve the matter, or if you have general questions regarding the KSA data protection legislation you may raise your concern with

the Saudi Data & Artificial Intelligence Authority (“SDAIA”) and/or the National Data Management Office (“NDMO”).

