

**EMAAR GROUP CUSTOMER SERVICES AND SALES AND MARKETING
DEPARTMENTS, PROCEDURE ON PROTECTION OF PERSONAL DATA**

1. Objective

The objective of this procedure is to ensure that sales and marketing and customer services conducted or to be conducted within the scope of selling and leasing real estate carried out within the body of Emaar Group Sales Marketing and Customer Services Units and shopping malls in the portfolio of Emaar Group are compliant with 6698 numbered Code on Protection of Personal Data (“**CPPD**”), legislation on protection of personal data and Emaar Group's Policy on Protection of Personal Data.

2. Scope of the Procedure

This procedure covers the issues on following activities carried out within the body of Emaar Group Sales Marketing and Customer Relations;

- i. all kinds of marketing activities related to shopping mall and all kinds of activities and campaigns conducted within this scope,
- ii. all kinds of marketing activities related to aquarium and all kinds of activities and campaigns conducted within this scope,
- iii. presale and/or prelease marketing for residences and offices and all kinds of activities and campaigns conducted within this scope,
- iv. aftersales and/or after lease marketing for residences and offices and all kinds of activities and campaigns conducted within this scope,
- v. pre/after Sale or pre/after lease customer services,
- vi. all kinds of marketing activities including the activities performed within the scope of dwelling, offices, hotel and shopping malls in the portfolio of Emaar Group.

3. Purpose of Processing Personal Data

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- a. The objective of Emaar Group Sales Marketing and Customer Services Departments is the whole of the purposes determined in registries in which Emaar Group companies are registered.
- b. The ground and purpose of Emaar Group concerning Personal Data processing is summarized as follows and Sales Marketing and Customer Services Departments commit that they will not go beyond the aforementioned objective and ground in terms of Personal Data processing;
- c. Emaar Group Sales Marketing and Customer Services Departments commit that they will process personal data of Emaar Group's customers pursuant to the principles specified within the frame of 4th article of CPPD excluding the exceptions stated in 5(2)(c) in compliant with the following objectives:
 - i. informing customers on promotion and marketing activities related to real estate in the portfolio of Emaar Group;
 - ii. informing customers on promotion and marketing activities related to aquarium or entertainment areas in the portfolio of Emaar Group;
 - iii. rendering continuous services to the customers who leased or purchased real estate from Emaar Group related to real estate; and
 - iv. determination of customers that may be potential buyer/lessee in terms of real estate in the portfolio of Emaar Group and engaging in target-specific marketing activities concerning aforementioned customers;
 - v. engaging in target-specific marketing activities directed on property owners/lessees and guests with regards to real estate in the portfolio of Emaar Group;
 - vi. keeping statistics on customers in terms of sales marketing and customer relations and increasing efficiency.

4. Protection of Personal Data in the process of Sales Marketing and Customer Services

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- a. Personal data requested by Emaar Group Sales Marketing and Customer Services Departments from data owners are evaluated within the scope of CPPD and provisions of related legislation.
- b. Emaar Group Sales Marketing and Customer Services Departments may collect and process the followings, including but not limited to those, belong to its customers, in association with its objective:
 - i. Identity card, driver's license, passport, residency certificate, birth certificate, marriage certificate etc. identity certificates and copies of those;
 - ii. all kinds of contact information such as address, telephone, e-mail, workplace etc.
 - iii. Photograph and video records shot during shopping, culture and entertainment and other activities or for security purposes;
 - iv. Any official documents certifying their signatures.

5. Data Collection Methods

Emaar Group Sales Marketing and Customer Services Departments may collect personal data by means of oral communication, e-mail, website, fax, telephone, mail, courier, hand delivery etc. methods.

6. Permission for Processing and Transfer

- a. Processing personal data at home and transfer of these to real and legal third parties is carried out pursuant to the provisions of Emaar Group's policies on protection of personal data together with Code on Protection of Personal Data and provisions of related legislation.
- b. Emaar Group Sales Marketing and Customer Services Departments are responsible for obtaining explicit declaration on consent from each customer before obtaining personal data of customers of Emaar Group listed in article **Error! Reference source not found.**

7. Security of Personal Data

Emaar Group Sales Marketing and Customer Services Departments carry out the obligations concerning data security pursuant to Code on Protection of Personal Data (CPPD) and provisions of related legislation and Emaar Group's Policy on Protection of Personal Data.

8. The process of Personal Data Processing of Emaar Group Sales Marketing and Customer Services Departments

- a. The term of storing personal data acquired from customers by related departments is as follows:
 - i. The duration of storing personal data of customers by Emaar Group Sales Marketing and Customer Services Departments will be stated in explicit consent declaration mentioned in article 6.b as 5 years.

9. Measures for the Protection of Personal Data and Maintaining these Correctly and Currently

Group Sales Marketing and Customer Services Departments maintain the personal data pursuant to CPPD and provisions of related legislation and Emaar Group's Policy on Protection of Personal Data.

10. Rights Associated with Personal Data

Data owners may use the rights related to them by applying to Emaar Group Sales Marketing and Customer Services Departments pursuant to CPPD and provisions of related legislation and Emaar Group's Policy on Protection of Personal Data.

11. Deletion, Demolition or Anonymization of Personal Data

- a. Emaar Group Sales Marketing and Customer Services Departments may delete, demolish or anonymize personal data acquired with the explicit consent of customers pursuant to CPPD and provisions of related legislation and Emaar Group's Policy on Personal Data Storage and Demolition provided that processing conditions are completely disappeared.
- b. The acquired personal data will be demolished, anonymized or destroyed in the soonest time by related departments upon termination of the duration specified in explicit consent declaration with regards to each customer.

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- c. In case of disappear of the purpose of processing personal data before termination of 5-years storage term specified in explicit consent declaration with regards to each customer, or in case of customer requests so by using his/her rights indicated in article9, personal data belong to aforementioned customer will be anonymized or demolished in the soonest time.
- d. Within this direction, for instance, in the event that explicit consent declaration for processing personal data of the customer who purchased or will purchase a real estate in the portfolio of Emaar Group for marketing purposes is not obtained from a customer, these personal data cannot be used with the aim of marketing activities.
- e. In the event that it is requested to re-use the personal data of the customer who purchased real estate in the portfolio of Emaar Group within the scope of marketing activities, it is required to acquire an explicit consent declaration again on the issue.
- f. Furthermore, an explicit consent declaration shall also be obtained from aforementioned customers by Emaar Group Customer Relations Department for processing personal data with the target of rendering continuous service in terms of real estate they own. In this respect, it is not possible to use acquired data by Customer Services Department for sales or marketing activities without explicit consent declaration.
- g. An explicit consent declaration must be obtained by Emaar Group Customer Services from customers for processing personal data with the purpose of sharing information regularly and within the scope of marketing activities with regards to shopping malls in the body of Emaar Group. In this respect, it is not possible to use acquired data for marketing activities without explicit consent declaration by Customer Services Department.
- h. Concerning the personal data acquired without explicit consent declaration before effective data of this procedure, it is required to obtain explicit consent declaration from the customers in question with the purpose of bringing the data acquired in such manner in compliance with CPPD and Emaar Group's Policy

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on Protection of Personal Data, and in the event that consent cannot be acquired, these data will be anonymized or demolished.

- i. Emaar Group Sales Marketing and Customer Services Departments commit that they will process personal data belong to customers of Emaar Group other than the purposes specified in article 2c.

12. Emaar Group Customer Services and Sales Marketing Departments, Amendments to be made in Policy on Protection of Personal Data

Emaar Group may make alterations in this Policy from time to time to the extent its activities require and required by law. Aforementioned changes will be announced to all employees in Emaar Group Customer Services and Sales Marketing Departments by means of e-mail.

13. Conclusion

Hereby this procedure will enter into force upon announcement to all employees working in Emaar Group Customer Services and Sales Marketing Departments. All employees working in aforementioned departments are responsible for application of this procedure and annual periodical audits will be actualized by Emaar Group in relation with the application.