

# CUSTOMER DATA PROTECTION POLICY



1. Introduction:	This Customer Data Protection Policy ("Policy") outlines the principles and procedures followed by Pal Cooling Holding LLC ("Company") to ensure the protection of personal data provided by our customers. This Policy follows the Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data ("PDPL") and any other relevant UAE regulations.
2. Purpose:	The purpose of this Policy is to: <ul style="list-style-type: none"><li>• Ensure that Personal Data is processed lawfully, fairly, and transparently.</li><li>• Protect the confidentiality, integrity, and availability of Personal Data.</li><li>• Outline the rights of Customers regarding their Personal Data.</li></ul>
3. Scope:	This Policy applies to all employees, contractors, and third-party service providers of the Company, and of its subsidiaries, who handle personal data related to our Customers in the UAE.
4. Definition:	<ul style="list-style-type: none"><li>• <b>Personal Data:</b> Any information that identifies or can be used to identify an individual, such as names, contact details, and billing information.</li><li>• <b>Processing:</b> Any operation or set of operations performed on Personal Data, including collection, storage, use, and sharing.</li><li>• <b>Data Subject:</b> An individual whose Personal Data can be collected and processed.</li></ul>
5. Data Collection:	We collect Personal Data only for legitimate business purposes related to our district cooling services, including but not limited to: <ul style="list-style-type: none"><li>• Customer identification and verification.</li><li>• Billing and payment processing</li><li>• Service requests and feedback.</li></ul>
6. Data Usage:	Personal Data is used only for the purposes for which it was collected. These purposes include: <ul style="list-style-type: none"><li>• Providing district cooling services.</li><li>• Managing customer accounts and service agreements.</li><li>• Communicating with Customers about service updates and billing.</li><li>• Complying with legal and regulatory requirements.</li></ul>
7. Data Retention:	Personal Data will be retained only for as long as necessary to fulfill the purposes for which it was collected or as required by law. Once it is no longer needed, data will be securely deleted or anonymized.
8. Data Security:	We implement appropriate technical and organizational measures to protect Personal Data against unauthorized access, alteration, disclosure, or destruction. These measures include: <ul style="list-style-type: none"><li>• Data encryption.</li><li>• Access controls and authentication mechanisms.</li><li>• Regular security assessments and updates.</li><li>• Secure storage facilities.</li></ul>
9. Data Sharing & Transfer	Personal Data may be shared with: <ul style="list-style-type: none"><li>• Authorized employees and contractors who require the data for their work.</li><li>• Third-party service providers engaged in support functions (e.g., billing services, IT support) under strict contractual obligations to protect data.</li><li>• Regulatory authorities as required by law.</li></ul> Personal Data will not be transferred outside the UAE unless there is a valid legal basis and adequate protection measures are in place.
10. Customer Rights:	Customers have the following rights regarding their personal data: <ul style="list-style-type: none"><li>• <b>Right to Access:</b> Customers can request access to their Personal Data held by the Company.</li><li>• <b>Right to Rectification:</b> Customers can request correction of inaccurate or incomplete data.</li><li>• <b>Right to Erasure:</b> Customers can request deletion of their data when it is no longer necessary for the purposes for which it was collected.</li><li>• <b>Right to Restriction:</b> Customers can request restrictions on processing under certain circumstances.</li><li>• <b>Right to Data Portability:</b> Customers can request to receive their personal data in a structured, commonly used, and machine-readable format.</li><li>• <b>Right to Object:</b> Customers can object to the processing of their data under certain conditions.</li></ul> Requests to exercise these rights can be submitted to our Data Protection Officer (DPO) using the contact information provided below.
11. Data Protection Officer (DPO)	Our Data Protection Officer (DPO) is responsible for overseeing compliance with this Policy and managing data protection queries. The DPO can be contacted at: <ul style="list-style-type: none"><li>• Name: Christos Katsaros</li><li>• Email: <a href="mailto:Christos.k@ihcutilities.com">Christos.k@ihcutilities.com</a></li><li>• Phone: +971 2 815 5555</li><li>• Address: Penthouse, Proceed Sustainability Hub by IHC, Al Halawi St., Ministries Complex, P.O. Box 53543, Abu Dhabi, UAE</li></ul>
12. Policy Review	This Policy will be reviewed annually or whenever there are significant changes to data protection laws or business practices. Updates to the Policy will be communicated to Customers as appropriate.
13. Complaints	If Customers have concerns or complaints regarding the handling of their personal data, they should contact our DPO. If they are not satisfied with our response, they have the right to lodge a complaint with the UAE Data Office or relevant regulatory authority.
14. Acknowledgment	By engaging with Pal Cooling Holding LLC and providing personal data, clients acknowledge that they have read and understood this Policy and consent to the processing of their personal data as described herein.

JANUARY 2025

  
**MUHAMMAD ZAFAR**  
(CHIEF EXECUTIVE OFFICER)