



DANA GAS GROUP DATA PRIVACY AND COOKIE POLICY

Dana Gas PJSC ("Dana Gas") and its group companies (together the "Group", "we", "our", "us" the "Companies") respect the privacy rights of our online visitors, customers and suppliers ("you", "your", "yours") and recognise the importance of protecting the information collected about them. Dana Gas is a public joint stock company listed on the Abu Dhabi Securities Exchange with its head office located in Sharjah United Arab Emirates. The Group consists of companies located in the Dubai International Financial Centre ("DIFC"), in the wider United Arab Emirates, as well as in a number of other jurisdictions.

We have adopted this group wide Data Protection and Privacy Policy (the "Policy") that details how the Group collects, stores, and uses the information that you provide to members of the Group when you visit our website <https://www.danagas.com> ("Website"), interact with our staff or utilise our products and services.

For the purposes of our DIFC affiliates, this Policy complies with the DIFC data protection laws.

Dana Gas is a Controller. Each other member of the Group is a Processor and, in some cases, a joint Controller. The prior capitalised terms being as defined in the applicable data privacy legislation.

PURPOSE

This Policy is provided to you to enable you to be fully informed of how the Group handles the data we collect about you. By providing your information to us and clicking to accept this Policy, you are accepting and consenting to the practices described in this Policy.

THIRD PARTIES

Our Website may contain links to and from websites belonging to other companies or organisations.

This Policy does not apply to websites or other platforms maintained by other companies or organisations to which we link, and the Group is not responsible for any personal information you submit to third parties. If you follow any link to another website, that website may have its own privacy policy. The Group does not accept any liability or responsibility for the privacy policies of third parties. It is recommended that you read the privacy policies of such other companies or organisations before submitting any personal details.

WHAT PERSONAL INFORMATION DO WE COLLECT FROM YOU?

We collect personal information about you in various ways, including, when you fill in and submit any forms on our Website or correspond with us via email or submit an inquiry to one of the companies in the Group.

In using the Website or interacting with any of the companies in the Group or staff members or representatives thereof, some or all of the following information together being "Personal Data" may be collected:

Personal Details

- (i) Your name, title, office address, e-mail address, phone number, location and identity documents.

Family, lifestyle and social circumstances

- (i) If you choose to interact with us via a social media platform, we will collect the information provided to us through that platform.



DANA GAS GROUP DATA PRIVACY AND COOKIE POLICY

Financial Details

- (i) Your bank details.

Special Categories of Personal Data

- (i) where you provide us with identity documents, we will process the data included on those documents, which may include sensitive data such as nationality.

The above information is defined as (“**Special Categories of Data**”).

In addition, information about you is collected automatically when you visit the Website. This may include technical information such as, for example, the IP address used to connect your computer to the Internet, browser type and version, time zone setting, cookies (see the “What About Cookies” section below) browser plug-in types and versions, and details of the device, operating system and platform that you use. Additional information that may be collected includes page response times, download errors, length of visits to certain pages on our Website, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from our Website. The above mentioned information being the “**Technical Information**”.

HOW YOUR PERSONAL DATA IS COLLECTED

Your Personal Data maybe collected:

- directly from you when you fill in forms on or interact with the Website, when you correspond with one of the Group companies or with any of their staff or representatives by phone or in writing (including by email) or interact in any other way;
- when you sign up for the Dana Gas newsletter;
- from cookies on the Website (see “What About Cookies?” section below) or similar technologies.
- When you interact with us in any other manner such as emailing us or providing information by telephone.

WHAT ABOUT COOKIES?

The Website does not use cookies.

THE PURPOSE FOR PROCESSING PERSONAL DATA

The Group may process your personal data for the following purposes:

Category of data	Purpose of Processing	Lawful Grounds
Personal Details: Your name, title, office address, e-mail address, phone number and location	Accounts and records: In the context of keeping records of purchases, generating invoices, sales and other transactions for the purpose of ensuring that the requisite payments and deliveries are made or services provided by us are delivered pursuant to any contract which you are administering for one of our clients.	Your Consent. By interacting with our staff or our Website, you consent to your data being used in the manner set out in the adjacent column. You may withdraw your consent at any time. Where you do withdraw your consent and you are a representative for a client, we will contact the client to obtain details of a replacement contact.



DANA GAS GROUP DATA PRIVACY AND COOKIE POLICY

	<p>Advertising, marketing and public relations: Where you sign up for our Alerts (as defined below), we will use your Personal Data to send such Alerts to you until you withdraw your consent.</p> <p>Consultancy and advisory services: where we deliver consultancy and advisory services and you are the point of contact or involved in the receipt of such consultancy and advisory services.</p>	
<p>Personal Details: Your name, title, office address, e-mail address, phone number and location and any information provided by you to us in the form of your CV, references or otherwise</p>	<p>Staff Administration: contacting you for an interview, administering the recruitment process, informing you of any decisions made and generating an employment contract for you.</p>	<p>Your Consent. By providing the aforementioned Personal Data to us and asking us to administer it for recruitment purposes you are consenting to the uses outlined herein. You may withdraw your consent at any time. Where you do withdraw your consent we may not be able to progress your application.</p>
<p>Personal Details: Your name, title, office address, e-mail address, phone number, location and identity documents</p>	<p>Administration of Membership Records/Licensing and Registration: administering investor and shareholder details.</p>	<p>Compliance with Applicable Law: Where you are a shareholder, investor or ultimate beneficial owner, we may use your personal data to comply with applicable laws regarding required filings and submissions and the keeping of required registers.</p>
<p>Personal Details: Your name, title, office address, e-mail address, phone number, location and identity documents</p>	<p>Accounts and Records: administering 'know your customer' details.</p>	<p>Legitimate Interest: prevention of fraud and money laundering.</p>
<p>Personal Details: bank details</p>	<p>Accounting and Auditing</p> <p>We may collect your bank details for the purposes of paying consultancy or other fees.</p>	<p>Performance of a Contract. Paying amounts due under contracts entered into with you.</p>



DANA GAS GROUP DATA PRIVACY AND COOKIE POLICY

Personal Details: Technical Information	Whilst this information typically does not identify you as an individual (only your computer), we have included details in this Policy for your information. This data is used to see where in the world the site is being used to ensure coverage, and for click stream analysis to help better understand site usage, so that we can improve our service to you.	N/A
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CONFIDENTIALITY OF YOUR PERSONAL DATA

We will ensure the confidentiality of your Personal Data and will limit access on a need-to-know basis, however, we may disclose your Personal Data:

- (i) where required by law, regulation or court orders;
- (ii) as necessary in the course of our business;
- (iii) to our employees involved in the provision of the products and services concerned;
- (iv) to third parties such as service providers involved in the provision of our products and services;
- (v) to other financial institutions, financial intermediaries, regulatory and governmental authorities if required by law and;
- (vi) our professional advisors.

We will not sell or disclose your information to any individual or entity outside of the Group and its subsidiaries or approved business partners without your permission.

RECORD MANAGEMENT AND RETENTION OF PERSONAL DATA

We will only retain your Personal Data for as long as necessary to fulfil the purposes for which we collected it, including satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data, and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, for example, where the basis of processing your data has changed or ceased to exist, we may anonymise your Personal Data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

If you have elected to receive marketing communications from us, we will retain personal information about your marketing preferences for a reasonable period of time, which will be determined by us based on the date you last expressed interest in our content, products, or services.

SECURITY

We are committed to ensuring that your information is secure. We implement internal security policies, rules and technical measures to protect your Personal Data that we have under our control. The security measures are designed to prevent unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss.



DANA GAS GROUP DATA PRIVACY AND COOKIE POLICY

We will update these policies, controls, and measures from time to time as appropriate, including when new technology becomes available.

YOUR RIGHTS

The Group aims to keep the Personal Data we hold about you as accurate as possible. As a data subject, you may have a number of statutory rights available to you. The actual rights available to you will depend on the data protection regime applicable to you and/or your Personal Data. The rights available to residents of the United Arab Emirates are below.

If you wish to enquire about your rights or exercise any of your rights, please follow the instructions in the 'Contact Us' section.

Where you make any request to us, we reserve the right to request further details from you to evidence your identity before processing your request.

- **The Right to Withdraw Consent**

Where we rely on your consent as the lawful ground for our processing, you may withdraw your consent at any time by notifying us in accordance with this section and the section entitled 'Contact Us.' We will cease any processing based upon your consent as soon as reasonably practicable, provided that no other lawful ground is available to us to continue such processing.

Any withdrawal of consent must:

- be in writing (either in hard copy or electronic form);
- notified to us by one of the methods set out in the section entitled 'Contact Us'; and
- clearly set out the processing for which consent is withdrawn.

In the event that the applicable legislation or regulations set out any additional requirements to which a withdrawal of consent must adhere, then such additional requirements shall apply in addition to the above requirements.

The withdrawal of consent will not affect the validity of the processing of your Personal Data that occurred prior to the withdrawal of your consent. Depending on the nature of the processing for which consent is withdrawn, this may affect your ability to receive certain products, services or functionality as detailed in this Policy.

- **The Right to Access, Rectification and Erasure**

You have the right to obtain from us confirmation as to whether Personal Data concerning you is being processed, the purpose of our processing, the categories of your Personal Data being processed, and the recipients or categories of recipients to whom we are disclosing your Personal Data.

In some cases, you may also request us to rectify any Personal Data that we hold about you.

You may also be entitled to require us to erase your Personal Data. This right may be available to you where the purposes of the processing are no longer necessary, the Personal Data must be deleted under applicable law, and there are no other grounds upon which we may rely to continue our processing. Please note that we may not be able to process your erasure request if applicable law requires us to retain such Personal Data or if it is subject to or for establishing a legal defence or legal claim.

We may not be able to process your erasure or rectification request when it is technically not feasible. In such cases, we will inform you and provide further details.



DANA GAS GROUP DATA PRIVACY AND COOKIE POLICY

We will endeavour to complete any request hereunder within one (1) month, but where the request is complex or there are numerous requests, it may take up to three (3) months. We shall notify you of any such delay and the reasons therefor. We may, where permissible, impose a reasonable fee to meet any extraordinary administrative costs in providing you with details of the information we hold about you.

We have the right to reject any request that is unfounded or excessive because of its repetitive character and we reserve the right, in such circumstances, to charge an administrative fee or take any other action or inaction as permitted by applicable law.

We may also be unable to provide you with certain information in certain circumstances pursuant to laws applicable to us. In such cases, we shall inform you of the reasons why and the remedies available to you should you disagree.

- **The Right to Object to Processing**

You may object at any time, on reasonable grounds, to any processing, which we carry out on the following grounds:

- it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us; or
- it is necessary for the purposes of our legitimate interests or those of a third party.

You also have the right to be informed before your Personal Data is disclosed for the first time to third parties or used on behalf of any third party for direct marketing purposes. Should we use your Personal Data for such purposes, we shall offer you the right to object.

- **The Right to Restriction of Processing**

In some circumstances, you may restrict the processing of your Personal Data. Please get in touch with us using the details provided in the 'Contact Us' section to find out more about what restrictions you may request and the circumstances in which we may continue to process, irrespective of such a request.

- **The Right to Data Portability**

Where our processing is carried out on the grounds of consent or the performance of a contract and is carried out by automated means, you may have the right to receive such data in a machine-readable format, provided that it is technically feasible to do so and such disclosure will not infringe the rights of any other natural person.

- **The Right to Object to any Decision Based Solely on Automated Processing.**

You have the right to object to any decision we make that is based solely on automated processing, including profiling, which produces legal consequences upon you or other seriously impactful consequences. You may also require such decisions to be reviewed manually. Please note that our recruitment or employment practices do not use automated decision-making or profiling.

- **The Right to Lodge a Complaint**

In regard to our Group companies located in the DIFC You may lodge a complaint with the Commissioner of Data Protection's Office at:



DANA GAS GROUP DATA PRIVACY AND COOKIE POLICY

Dubai International Financial Centre Authority

Level 14, The Gate Building
+971 4 362 2222

commissioner@dp.difc.ae

For complaints relating to any of our other companies you may lodge a complaint with The UAE Data Office, or the UAE Ministry of Economy's Consumer Complaints Department <https://www.moec.gov.ae/en/complaints-service>.

We encourage you to first raise any complaint directly with us.

MARKETING OPT-IN AND EXERCISING YOUR RIGHTS

Where you visit our Website, you will be given the opportunity to subscribe to our regular update service which may send you updates, newsletters, alerts for new products, features, enhancements ("Alerts").

Alerts may be sent by email, SMS, WhatsApp, push notification or other electronic communications means as well as by postal mail.

Alerts which you subscribe to will only be sent by us.

At all times, we will offer you the opportunity to unsubscribe from any Alerts. All electronic Alerts that we send you will contain an easy automated unsubscribe link so that you can opt-out of that particular Alert. To opt out of direct mail Alerts, please contact us on +971 6 5194 469 or by email at neville.henwood@danagas.com.

SHARING YOUR PERSONAL DATA

Your Personal Data may be shared internally within the Group and your Personal Data may also be shared with:

- Third parties that process data on its behalf for the purposes of providing services to the Group such as website hosting, data storage, software services, email services, marketing, fulfilling customer orders, providing payment-related services including payment aggregation, data analytics, data mining, providing customer services, and conducting surveys, as permitted by applicable law. These companies may be located within or outside the territory of the DIFC, but in any case, they are obligated to protect your data.
- Regulatory authorities or other government entities to ensure compliance with its legal and professional obligations, including in response to a request made by a government authority.
- Law enforcement authorities and courts.
- Financial institutions.
- Professional advisors providing services to the Group such as legal and accounting services.
- If we sell or buy any business or assets, in which case, prospective sellers or buyers of such business or assets.

All unsolicited/public information shall be deemed to be non-confidential and we shall be free to reproduce, use, disclose, and distribute such unsolicited/public information to others without limitation or attribution.

TRANSFER OF YOUR PERSONAL DATA TO OTHER COUNTRIES OR JURISDICTIONS

The information you give us may be transferred to other countries. For example, some of the Group's offices, third-party providers, or facilities are located outside of the DIFC and/or the UAE.



DANA GAS GROUP DATA PRIVACY AND COOKIE POLICY

In such circumstances, we will take such organisational, contractual, and legal measures as are required under applicable legislation or regulations to ensure that your Personal Data is processed only for the purposes mentioned above and that, where required, adequate levels of protection have been implemented in order to safeguard your Personal Data.

In regard to companies within our Group who are situated in the DIFC, where Personal Data held by those companies will be transferred to a jurisdiction that does not have an adequate level of protection, as determined by the Commissioner of the DIFC, such recipient will be required to enter into the standard contractual clauses issued by the DIFC. A copy of the agreement between us and the recipient may be requested under applicable law.

In regard to companies within our group who are situated outside of the DIFC or outside of the UAE, where your Personal Data will be transferred to a jurisdiction that does not have an adequate level of protection under applicable law, the transferring company may be required to enter into a contract with the recipient or ensure other requirements have been met in accordance with applicable legal requirements.

If you do not agree to the transfer, storage and use of your information in any other country where we operate, please do not click "ACCEPT" on our privacy and cookie banner.

DATA BREACH

In the event we become aware that the security of our services has been compromised or your Personal Data has been disclosed to unrelated third parties as a result of external activity, including, but not limited to, security attacks or fraud, we reserve the right to take reasonably appropriate measures, including, but not limited to, investigation and reporting, as well as notification to and cooperation with law enforcement authorities. In the event of a data breach, we will make reasonable efforts to notify affected individuals if we believe that there is a high risk of harm to the user as a result of the breach or the breach would prejudice the privacy and confidentiality of the user or if notice is otherwise required by law. When we do, we will post a notice on our Platforms, and where required, send you an email. If for any reason, you have a reason to believe that your Personal Data shared with us is no longer secure, you may contact us via our e-mail address at neville.henwood@danagas.com.

CONTACT US

To contact us relating to any concerns in relation to this Policy or to exercise your rights, please send a communication:

- By email to neville.henwood@danagas.com with the subject "Data protection"; or
- By any postal means with which there is evidence of receipt by the company, addressed to the following address: Crescent Tower 11th floor, Sharjah, United Arab Emirates indicating on the envelope the reference "Data Protection"

DIFC COMPANY DETAILS

This Policy applies to the Group's DIFC affiliates whose details are set out below and this policy is written to comply with the DIFC data protection law.

Dana Gas Upstream Holdings Limited

Unit OT 09-30, Level 9, Central Park Offices, Dubai International Financial Centre, Dubai,
United Arab Emirates.



DANA GAS GROUP DATA PRIVACY AND COOKIE POLICY

Dana Gas Midstream Holdings Limited

Unit OT 09-30, Level 9, Central Park Offices, Dubai International Financial Centre, Dubai,
United Arab Emirates

Both of the above DIFC affiliates may be contacted using the same methods and details set out in the 'Contact Us' section.

DISPUTE RESOLUTION

The terms of this Policy, its subject matter and formation, are governed by the laws of the United Arab Emirates as applicable in the Emirate of Sharjah. The courts of Sharjah, United Arab Emirates shall have exclusive jurisdiction over any dispute arising out of this Policy or use of our Website.

ISSUE DATE

This Policy was last updated on 27 November 2024.

DISCLOSURES

This Policy shall be published on the Website.

SEVERABILITY

If any term or condition of this Policy is deemed invalid or unenforceable by a court of law or tribunal with binding authority, then the remaining terms and conditions shall not be affected.

AMENDMENTS & CHANGES

The Policy shall be reviewed from time to time in the light of any regulatory change(s) and/or amendment(s) requiring modification to the Policy or otherwise as may be considered necessary. Any change to the Policy shall be carried out with the approval of the Board of Directors. If possible, we will notify you of any changes to this Policy using the contact information you have provided us, and you consent to being contacted by us for this purpose.