

Sovereign - Pro Partner Group Oman Privacy Notice for provision of company formation and other incidental services (such as payroll, HR and corporate secretarial services) (the “Services”)

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 the Services to you. 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.

This Privacy Notice may be updated and/ or re-issued at any time, and we will provide you with notice of any such updates via either email and/or website.

2. What Personal Data is

'Personal Data' means any data that identifies a natural person or makes them identifiable, directly or indirectly, by reference to one or more identifiers such as the name, civil number, or electronic identifiers data or spatial data, or by reference to one or more factors specific to the genetic, physical, mental, psychological, social, cultural, or economic identity.

'Sensitive Personal Data' refers to any personal information that directly or indirectly discloses the individual's ethnic or racial origin, political, or philosophical opinions, religious beliefs, trade union affiliation, criminal record, or any data relating to their health or sexual status.

3. Personal Data we collect

The Personal Data we collect about you will be the minimum necessary to provide the Services. The type of Personal Data we collect is outlined in the table below in the section entitled 'Purposes, lawful bases and retention periods'.

4. How we collect your Personal Data

We collect most of the Personal Data directly from you in person, by telephone including but not limited to any information exchanged over any private messaging application, text or email and/or via our website.

5. Purposes, lawful bases and retention periods

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:



Categories of individuals	Categories of Personal Data	Purpose of Processing	Lawful Basis	Retention Period
<p>Client</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>Consent</p>	<p>It is our normal practice to retain documents relating to our engagement as prescribed in the local Oman regulations (which is in between five to ten years (5-10) depending on the jurisdiction in which you are incorporated or registered) from the end of the relevant Service.</p>
	<p>B. Contact information – Your home address, your phone number, your personal email address and your residency status in Oman (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>Consent</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>Consent</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>Performance of a contract</p>	
	<p>E. Financial information – your salary with the benefits and</p>	<p>We are required to request and maintain this information to satisfy</p>	<p>Consent</p>	



	<p>allowances and your bank account details.</p> <p>F. Financial/Criminal Screening – Conducting a World Check against your name.</p>	<p>the Know Your Client (KYC) requirements.</p> <p>We are required to request and maintain this information to satisfy the Know Your Client (KYC) requirements.</p>	<p>Consent</p>	
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6. Sharing your Personal Data

In the course of providing you with the Services – we may need to share your Personal Data with the following third parties:

1. Our affiliates, where necessary for the purpose of providing the Services.
2. Certain service providers we have retained in connection with the Services we provide, such as translators or other necessary entities.

When we carry out searches, using the relevant platforms and/or regulators for the purposes of processing your application and/or during the course of your relationship with us such as money laundering and terrorist financing checks, credit risk reduction and other fraud and crime prevention purposes and companies providing similar services, including financial institutions, credit reference agencies and regulatory bodies with whom such personal data is shared.

7. Retention

We have implemented robust IT management systems, such as One Viewpoint, to ensure the security of our data. These systems adhere to recognized standards, 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 Oman regulations (which is in between five to ten years depending on the jurisdiction in which you are incorporated or registered) 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.

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.

Upon termination or expiry of the relevant period, we securely erase your personal data in accordance with the Oman Data Protection legislation.

In some circumstances 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.

8. International Transfers

Your personal data may be shared within the Sovereign Group. This may include transferring your personal data to other Group offices.

We may also share your personal data with 3rd party service providers. If we do so, we will enter into appropriate contractual arrangements to oblige the entities in those countries to operate to appropriate data protection standards.

- These include Standard Contractual Clauses (SCCs) approved by the European Commission, which will be amended and applied accordingly to take into consideration the relevant requirements of the Oman Data Protection legislation, to ensure that those entities that operate in those countries to maintain adequate and sufficient data protection standards expected within the EU/EEA.

In such cases, our service providers and suppliers are data processors and may only use the data in line with our instructions and not for any other purpose. This and other obligations are agreed in the data processing contract between us.

9. Your rights and how to complain

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

- **Request access** to your personal data (commonly known as a “Subject Access Request”). This enables you to receive a copy of the personal data we hold about you and to check we are lawfully processing it.
- **Request rectification** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for to continue processing it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Right to be informed in the event of a security breach** of your personal data. This enables you to ask us to be informed in the event of a personal data security breach that causes their personal data to be destroyed, altered, disclosed, accessed, or otherwise processed unlawfully.
- **Request the transfer** of your personal data to another party (data portability).

You have the right to lodge a complaint with the MTCIT, if you believe SPPGO is infringing the data protection laws or you are concerned about the way in which we are handling your personal data.

The supervisory authority in the Sultanate of Oman is the MTCIT. You can visit us at:

Ministry of Transport, Communications and Information Technology (MTCIT)

Muscat, P.O Box 684, Zip Code: 100

Sultanate of Oman

Or alternatively, you can email us at info@mtcit.gov.com or call our direct dial for the communication & information technology services at (+968) 80077777.

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 from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

10. How to contact us and our Data Protection Officer

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 as follows:

dpo@Sovereigngroup.com

11. Changes to this privacy notice

Sovereign – Pro Partner Group Oman 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 policy was last updated on 05 March 2024.