

Reem Finance PJSC

Data Privacy Policy

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Reem Finance PJSC (“Reem Finance”), is a leading finance company that is committed to provide customized financing solutions to Individuals and Small and Medium sized Enterprises (SMEs) in the UAE. It was founded 19 years ago and is fully operated under Central Bank UAE guidelines. **Reem Finance** offers a range of funded and non-funded solutions tailored to the needs of its customers as well as offers highly lucrative deposits products like corporate deposits and Deposit backed non-funded products to SMEs. It is headquarters in Abu Dhabi and serves customers across the UAE.

VISION

To be the market leader in specialized commercial lending and financing for a wide range of businesses.

MISSION

To offer a customized, timely and transparent finance platform for businesses and entrepreneurs.

VALUES

- ✓ *Business Excellence:* Reem Finance prides ourselves on its speed and quality of execution. In addition to its expanding product offering, Reem Finance is also able to offer the support and services of our group partners. Every aspect of our work is in partnership with our clients. We always aim to meet or client’s expectations.
- ✓ *Agility:* Our ownership structure and broad lending experience provide a solid foundation to support our clients’ business needs. Reem Finance can provide finance terms that allow for rapid drawdown and tailored structures, in a manner that is generally not offered by conventional banks.
- ✓ *Partnership:* Our commitment to our clients goes beyond any individual transaction. We respect our clients as our partners and invest our comprehensive capabilities into achieving their goals.
- ✓ *Respect and Integrity:* Ethical behavior is an integral part of everything we do. Our performance is underpinned by our transparent vision and compliance with all relevant financial regulations.

1. Executive Summary

Reem Finance PJSC (“the Company” or “RF”) is authorized by the Central Bank of the United Arab Emirates (“UAE”) to conduct financing business as stipulated in Article 2 of the Central Bank Circular No: 3/2023 and notice number 4888/2023 dated 23rd May 2023 regarding the regulation for finance companies (the “CB Regulations”).

Senior Management for the purpose of this policy will be anyone who is a member of Reem Finances’ Executive Management (herein refer to as “EXM”).

The use of “must” “will” or “shall” in any policy statement indicates mandatory compliance. The use of “may” indicates a recommendation which may be implemented where applicable i.e. good practice.

2. Introduction

Reem Finance PJSC (RF) recognizes the importance of protecting personal data and maintaining the confidentiality of customer information and sensitive business data. As part of its commitment to responsible data handling, Reem Finance has established this Data Privacy Policy to define the framework for the collection, processing, use, storage, and protection of personal information.

This Policy ensures that personal data is managed in a secure, transparent, and lawful manner, in accordance with the UAE Personal Data Protection Law (PDPL) and other applicable UAE regulatory requirements, while supporting Reem Finance’s business operations and regulatory obligations

3. Definitions

Acronyms	Definitions
CB	UAE Central Bank
CEO	Chief Executive Officer
COO	Chief Operating Officer
CIO	Chief Information Officer
EXM	Senior / Executive Management

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FCR	Finance Company Regulations issued by CB in 2023
HOC	Head of Compliance
DPO	Data Protection Officer
ITD	Information Technology Department
IT	Information Technology
ISMS	Information Security Management System, which encompasses requirements of ISO 27001:2022, Information Assurance Standard (IAS), and PCI: DSS.
ISMC	Information Security Management Committee
IA	Internal Audit
HoIA	Head of Internal Audit
HOR	Head of Risk
RF / The Company	Reem Finance PJSC
End Users	All Reem Finance employees, outsourced staff, and external entities—including outsourced vendors, cloud service providers (CSPs), and fintech or strategic partners who access and use Reem Finance’s information systems and associated assets to perform job-related responsibilities or fulfil contractual obligations. This includes those connecting to Reem Finance systems under outsourcing arrangements and in alignment with the Consumer Protection Standards (CPS) issued by the Central Bank of the UAE (CBUAE).
Information Assets	This includes Reem Finance electronic and computing equipment, personal equipment, information in hard copies and soft form, hardware, software, human resources, physical assets, and service assets of Reem Finance, whether hosted in-house, outsourced to a third party, or stored in the cloud, which hosts RF information.

4. Purpose and Scope

The purpose of this policy is to demonstrate Reem Finance PJSC's (RF) commitment to safeguarding the privacy of customer information and Reem Finance's sensitive commercial/financial data.

This Data Privacy Policy outlines how Reem Finance collects, processes, and protects personal information. Reem Finance is committed to safeguarding privacy and ensuring that personal data is handled in compliance with the UAE Personal Data Protection Law (PDPL) and other UAE Regulations.

This policy applies to all End Users and functional/business units.

This policy also applies to all Information, Communication, Technology, and Computing assets (hereinafter referred to as Information Assets) of Reem Finance, whether hosted in-house, outsourced to a third party, or on cloud.

In the event of any conflict, the laws and regulations of the United Arab Emirates (UAE) shall always supersede this policy.

5. Distribution

The Data Privacy Policy will be made accessible to all staff of Reem Finance. A copy should also be made accessible on the Company's intranet.

6. Document Control

The Data Privacy Policy shall be reviewed at least on an annual basis and as whenever required to reflect developments in the Requirements.

Amendments to the Data Privacy Policy will be initiated by HOIS, reviewed by CIO and HOR and approved by the ISMC, prior to its application.

Following the approval of the amendments by the ISMC, the document change control table will be updated.

7. RACI Matrix

R-Responsibility: Role responsible for getting work done				
A-Accountable: The Role that is ultimately accountable for the success or failure of a task.				
C- Consulted: The Role that is consulted and whose opinions are sought				
I-Inform: The role that is kept informed on progress				
Roles \ Activities	ISMC	DPO	HOIS	HoDs
Approval and enforcement of Policy	A	R	C	C
Review of Policy	A	R	C	C
Implementing Policy	A	R	I	I
Adhere to policy	A	R	C	R

8. Privacy Policy

8.1 Purpose of Collection of Personal Information

Reem Finance collects personal information to:

- i. Provide and enhance our services.
- ii. Comply with legal and regulatory obligations.
- iii. Protect the security and integrity of our systems.
- iv. Support marketing and promotional activities (with consent).

8.2 Manner of Processing Personal Information

Personal Information will be:

- i. Collected fairly and lawfully, for specified purposes.
- ii. Processed using secure methods to protect against unauthorized access, misuse, and loss.
- iii. Used only as needed for the purposes it was collected and in compliance with applicable laws.

8.3 Security Controls for Protection of Personal Information

Reem Finance shall apply robust security measures, including:

- i. Data encryption (in transit and at rest).
- ii. Secure access controls.
- iii. Regular security audits.
- iv. Compliance with ISO 27001 standards and best practices to protect your data

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8.4 Use of Cookies and Tracking Tools

Reem Finance uses cookies and similar technologies to enhance its customers' online experience. Cookies help RF:

- i. Remember preferences.
- ii. Analyse website traffic and usage.
- iii. Deliver targeted advertising (with consent).

Customers can manage their cookie preferences via browser settings.

8.5 Information Collected

Reem Finance may collect various types of information, such as:

- i. IP address, browser type, device information, and domain details.
- ii. Location data when the data subject accesses the services.
- iii. Any other information voluntarily provided by the data subject, such as name, email, and phone number.

8.6 Sharing of Information with Third Parties

Personal information may be shared with trusted third-party service providers, including:

- i. Cloud hosting providers.
- ii. Legal and compliance advisors.
- iii. Background screening vendors
- iv. Marketing partners (only with consent).

RF ensures that strict data protection agreements are in place to bind these third parties.

8.7 User Rights

Data Subjects have the right to:

- i. Access and review their personal data.
- ii. Request correction of inaccurate data.
- iii. Request deletion of their data where applicable.
- iv. Withdraw consent for data processing at any time.

To exercise these rights, data subjects may contact the RF DPO.

8.8 Contact Information for Data Privacy Queries

If a data subject has any questions about how Reem Finance handles personal data, or if the data subject wishes to exercise rights under applicable privacy laws, the data subject may contact:

- i. Data Protection Officer (DPO): Mohamed Roshdy Elbastaweesy
- ii. Email: roshdy.e@rf.ae
- iii. Phone: +971 6918 400 / 450

8.9 Reem Finance's Commitment to Privacy and Security

Reem Finance is fully committed to protecting personal information. Reem Finance adheres to internationally recognized data privacy frameworks, including the UAE PDPL, and continually updates its practices to ensure compliance with evolving laws and technologies.

8.10 Period for Validity of Terms and Conditions

This Data Privacy Policy is valid for 12 months from the date of issue. Reem Finance reserves the right to update this policy periodically to reflect changes in legal requirements or our data handling practices.

8.11 Information Security Standards and Practices

Reem Finance adheres to internationally accepted information security standards, including but not limited to:

- i. ISO 27001 certification for Information Security Management Systems (ISMS).
- ii. Regular internal and external audits of our security practices.
- iii. Continuous monitoring and improvement of our security controls.

8.12 Consent for Identification and Internet Activities

Reem Finance will not use information about data subjects' online activities in combination with personally identifiable information (such as name or email) without the explicit consent of the data subject.

8.13 Cookie and Tracking Technology Usage

Reem Finance uses cookies, single-pixel GIFs, and other tracking technologies for site functionality, analytics, and marketing. These technologies are not associated with personally identifiable information unless the data subject provides explicit consent.

8.14 Safeguards for User Information

Reem Finance adheres to robust policy guidelines and technical measures to safeguard personal information from unauthorized access, disclosure, or misuse. Reem Finance regularly updates security practices to align with emerging technologies and best practices.

8.15 User Access and Correction Requests

Data subjects may request access to all personally identifiable information maintained by Reem Finance, including, but not limited to, name, address, email, and phone number. Data subjects may request corrections to any inaccurate data, and appropriate updates will be made.

8.16 Investigations and Unlawful Activity

Reem Finance may use personally identifiable information to investigate and prevent potentially unlawful activities, security threats, or violations of service agreements, while adhering to UAE legal and privacy frameworks, such as the PDPL.

8.17 Data Breach Management

The Data Management Control Framework, developed, owned and implemented by the DPO, will have policies, procedures, system controls, and checks and balances to protect Consumer Data and to identify and resolve any incidents of information security breaches, when they may occur. This Data Management Control Framework will address all CBUAE CPR/CPS and PDPL requirements for the management and retention of consumer records (section 6.1.6 of the CBUAE CPS).

9. Policy Compliance

- i. All End Users must comply with the applicable information security policies, standards, procedures, and guidelines. Reem Finance HoDs must ensure continuous compliance monitoring within their units.
- ii. Any employee found to have violated this policy and other applicable UAE laws & regulations may be subject to disciplinary and corrective action, up to and including termination of employment. Penalties or disciplinary action will be consistent with the severity of the incident, as determined by an investigation, and may include, but not be limited to:
 - a. Loss of access privileges to information assets
 - b. Other actions as deemed appropriate by management, Human Resources, and the Legal Department.
- iii. All exceptions must be communicated through the Policy Waiver Request Form, as defined in the waiver criteria.

10. Waiver Criteria

- i. Requests for waivers from this framework shall be formally submitted to the ISMC, including justification and attributed benefits, and must receive ISMC approval. These waivers are intended solely for exceptional situations involving non-compliance with the policy for a specified period, which may not exceed one year.
- ii. The waiver shall be monitored to ensure its concurrence within the specified period of time and exceptions. After the time period, the need for the waiver should be reassessed and re-approved, if necessary.

11. References

The following are directly relevant to this policy:

- i. Information Security Policy
- ii. Annexure A: Controls Description

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iii. Annexure B: Glossary

Annexure A: Controls Description

Control Reference (ISO 27001:2022)	Control Description
A.5.31 Legal, statutory, regulatory, and contractual requirements	Legal, statutory, regulatory, and contractual requirements
A.5.34 Privacy and protection of personal identifiable information (PII)	Privacy and protection of personally identifiable information (PII)
UAE IA Regulations	Control Description
M5.2.1 Identify Applicable Legislation	The entity shall define, document, and maintain all applicable legislation's (including statutory, regulatory, and contractual) compliance requirements related to information security and the entity's approach to meet these requirements.
M5.2.4 Data Protection & Privacy	The entity shall ensure data protection and privacy as required in relevant legislation, regulations, and, if applicable, contractual clauses.
PCI DSS v4.0.1	Requirement Description
12.4	PCI DSS V4.0.1 compliance is managed.
12.3	Risks to the cardholder data environment are formally identified, evaluated, and managed.

Annexure B: Glossary

1. **Accountability:** The guarantee that an action can be linked to an identified subject and that this subject is made accountable for all selected actions.
2. **Authentication:** The identification requirements are associated with an individual using a computer system. The computer system must securely maintain identification information that can be related to an individual's authorization and system activities.
Three types of factors are used to provide authentication:
 - a) Something you know (i.e., a password)
 - b) Something you have (i.e., a certificate or smart card)
 - c) Something you are (i.e., a fingerprint or retinal pattern)
3. **Availability:** Ensuring that authorized users have access to information and associated assets when required.
4. **Confidentiality:** Ensuring that information is accessible only to those authorized to have access.
5. **Privacy:** Information provided by employees, customers, and others is protected such that it is used solely for the stated purposes of the enterprise's customer privacy policies, the provider has authorized such use, and its use complies with all local government privacy regulations.
6. **Personal Information:** Information classification that relates to their "privacy" type. This could be either customer-related information or private information about End Users (such as medical records).
7. **Sensitive Information:** Information requiring some protection, not generally available internally. Security requirements include single-factor authentication (logon ID and password), authorization on an "as needed" basis, and a mandated 128-bit encrypted work session using Secure Sockets Layer (SSL), with a minimum web browser version requirement or equivalent.
8. **Data Subject:** A Data Subject is any identified or identifiable natural person to whom personal data relates. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.