

POL-BH Data Privacy Policy

A Lulu International Exchange B.S.C (c) Document

Document

POL-BH COMP013

Created

20-05-2018

Updated

14-09-2026

Controller

Compliance Officer/MLRO

Owner

General Manager

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Revision History

Date	Version	Author	Comments (including Review History)
20-05-2018	Draft	Peregrino Rodrigues	Initial document designed as per Group BPMS
29-05-2018	V 1.0	Peregrino Rodrigues	Policy updated to be in line with GDPR for Bahrain operations
10-02-2022	V2	Peregrino Rodrigues	Reviewed by Board of Directors
07-09-2023	V3	Peregrino Rodrigues	Policy updated to meet the PDPL requirements and approved by the Board
31-01-24	V4	Peregrino Rodrigues	Redesigned the document to meet the standards
21-01-2025	V5	Peregrino Rodrigues	Annual review completed, fine tuned the policy.
15-10-2025	V5.1	Peregrino Rodrigues	Added Job Applicant consent
20-10-2025	V5.2	Peregrino Rodrigues	Added Retention period for applicants data storage
14-09-2026	V5.3	Peregrino Rodrigues	Updated DPG Name and Email Contact

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1 Summary

Purpose	The Data Privacy Policy is established to: Detail the way the Lulu International Exchange BSC Closed or Lulu Financial Group is collecting, storing, maintaining, and distributing personal data of its customers.
Scope	This policy applies to: Lulu International Exchange BSC (c) and Lulu Financial Group, its associates, affiliates, branches, partners, or third-party agents or correspondents.
Functional Responsibility	The functional responsibility for this document lies with the Compliance Officer/MLRO .

2 Related documents

Policies	POL-BH AML/CFT Policy
Procedures	PRD-BH Corporate Governance
Work Instructions	N/A
Other	N/A

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Definitions

Term or Acronym	Description
Audit	A systematic and documented verification process of objectively obtaining and evaluating evidence to determine whether the Group is conforming to the Regulations, policies, procedures, and practices to comply with legislative requirements.
CO/MLRO	Compliance Officer / Money Laundering Reporting Officer
CCO / GM	General Manager
IA	Internal Auditor
Company/ Group	Lulu International Exchange BSC (c) / Financial Group, its associates, subsidiaries, and branches.
Customer	Any individual or corporate that has been formally on-boarded and registered with Lulu International Exchange BSC closed
Fraud	The intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury.
Platform	Any channel used to provide the products and services of Lulu International Exchange BSC (c) to the Customer, i.e. the Branch, the WebApp, the Mobile App etc.
DPG	The independent/ external person/ entity licensed by the Authority who shall be responsible to implement the provision of the Law. The person appointed by the Authority pursuant to Article (10) of this Law
Consent	Consent of the data subject means any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by clear affirmative action, signifies agreement to the processing of personal/ sensitive personal data relating to him or her.
Data Subject:	The person or individual subject of data. Third party: any person other than any of the following: 1. Data subject; 2. Data controller; 3. Data processor; 4. Data protection guardian; or

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	5. Any person, under the direct authority of the data controller or data processor, authorized to process data for the benefit of data controller or data processor.
Privacy by Design	A method of data processing system that seeks to proactively provide the maximum extent of privacy by ensuring that personal data is protected in a technological system or business practice by default, and applies security measures at all stages of processing in a way that anticipates and prevents privacy implications prior their occurrence.
Law	Personal Data Protection Law issued by Law No. (30) of 2018
Data Breach	A data breach is the intentional or unintentional release of secure or private/confidential information to an untrusted environment. Other terms for this phenomenon include unintentional information disclosure, data leak, information leakage, and also data spill
Cookies Wall	The practice in the context of information network which requires the users consent prior accessing the website to create a file to analyze and store his information and behavior
Binding Corporate Rules	Policies and procedures, aggregated or incorporated in a single written document by regional or international groups that are submitted to the Authority, to regulate the transfer personal data between them, and which shall contain provisions that aims to protect such data
Register	Any register that includes personal data, that enables the public to view it for a fee or free of charge
Regional or international group:	companies and their branches in several countries, and parent companies and their subsidiaries in other countries.
Blocking	marking stored data, by any means, to prevent its further processing, except for storing it.
Direct Marketing	communication, by whatever means, of any marketing material or advertisement which is directed to a particular person.
External Data Protection Guardian	Natural or legal person enrolled in the data protection guardians register, specifically in the External Data Protection Guardians Section
Internal Data Protection Guardian	. Natural person who works for the Data Controller to perform the duties of a Data Protection Guardian and enrolled in the Internal Data Protection Guardians section.

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4 Introduction

The Lulu International Exchange BSC closed, and its Group introduces a new Data Protection Policy to be distributed among all its employees, internal and external stakeholders, and third-party related persons and entities; in this policy, it describes the methodologies and tools used in order to identify, collect, maintain, store, and retrieve any kind of personal data related to external and internal entities.

The key objectives of the data privacy policy are:

- Compliance with laws and regulations
- Better personal data management
- Protection against security threats
- Employee awareness
- Data protection by third parties

5 Policy Statements

The Management of Lulu International Exchange BSC and the Group is responsible for the identification of the data that is included under this Policy and makes sure the article within this Policy is always followed.

Each member of the management team will be familiar with the types of improprieties that might occur within his or her area of responsibility and be alert for any indication or irregularity related to the Policy.

Any irregularity that is detected must be reported immediately to the the CO and IA, or other affected functions within or outside the Lulu International Exchange BSC (c) or the Group so as to be assessed and acted upon immediately.

6 Principles

The Company adheres to the following key principles with regard to personal data protection:

6.1 Lawfulness and Fairness

Personal data is collected, processed, and stored in compliance with applicable laws and regulations, including the PDPL and any regulations or guidelines issued by the CBB. The Company ensures transparency and fairness in its data processing activities.

Prior to engagement company shall have an agreement in place with the third-party clearly defining the terms and conditions along with clear responsibility of Data Controller and Data Processor for the collection, sharing and processing of personal data.

6.2 Purpose Limitation:

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Personal data is collected for specified and legitimate purposes, and it is not further processed in a manner that is incompatible with those purposes. The Company clearly communicates the purposes to data subjects and obtains their consent where required.

6.3 Data Minimization

The Company ensures that the collection of personal data is limited to what is necessary for the intended purposes. Only relevant and adequate data is collected, and unnecessary data is not retained.

6.4 Accuracy

Personal data must be sufficient and pertinent to the specific purpose for which it was collected, ensuring that it is not overly extensive or unnecessary in relation to the intended use, thereby maintaining the principle of data minimization.

Reasonable steps are taken to ensure the accuracy and currency of the personal data collected. Data subjects have the right to request rectification of inaccurate or incomplete data, and the company promptly addresses these requests.

6.5 Storage Limitation

Personal data is retained only for as long as necessary to fulfill the purposes for which it was collected, or as required by applicable laws and regulations, as well as by company policy. The company has policies and procedures in place to regularly review and securely dispose of data that is no longer needed.

6.6 Security

Appropriate technical and organizational measures are implemented to protect personal data against unauthorized access, disclosure, alteration, or destruction. The Company maintains confidentiality, integrity, and availability of personal data, and regularly assesses and enhances its data security measures.

6.7 Data Subject Rights

The Company recognizes and respects the rights of data subjects, including the right to access, rectification, erasure, objection, and restriction of processing, as provided by the PDPL. The Company has mechanisms in place to facilitate the exercise of these rights and promptly responds to data subject requests.

6.8 Data Transfers

When transferring personal data outside Bahrain, the Company ensures that appropriate safeguards are in place to protect the data in accordance with the requirements of the PDPL and any applicable guidance issued by the CBB.

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6.9 Accountability

The Company is accountable for its data protection practices. It maintains records of its data processing activities, conducts periodic reviews and testing to ensure compliance with this Policy and applicable laws, and cooperates with the CBB in any audits or investigations related to data protection.

7 Policy Notes

7.1 Who we are.

We, members of the Lulu Financial Group, are registered and licensed by the Central Bank of the country we operate in and referred to in this Privacy Policy as 'We', 'Us', 'Our' (including all grammatical variations). e.g.: Lulu International Exchange BSC closed is registered and licensed by the Central Bank of Bahrain.

7.2 Introduction to the Policy (Data privacy policy)

This data privacy policy ("Privacy Policy") published and shared by Lulu International Exchange BSC closed and the Group governs the use of personal and financial data supplied by our customer availing any of our services whether on our website, mobile app or through any other medium ("Platform").

Customer confidentiality is extremely important to us. We understand the responsibility to keep your information private and confidential. When you visit our website, you can be assured that your privacy will be respected.

We respect your right to privacy and will not ask you for any personal information about yourself. If you do choose to provide us with personal information, we ensure to treat it with the utmost care, ensuring that it is kept private, treated correctly, and processed legally.

We comply with all applicable laws and regulations in all operational jurisdictions, including the Personal Data Protection Law of Bahrain. Any information collected, retained, or processed will be completed.

Customer's privacy is secured and protected. We want to strengthen that trust by being transparent with how we collect, use and protect the Customer's Personal Data (defined hereinafter).

The information that the Customer shares with us, enables us to provide the Customer with, and allows us to constantly improve our Services such as (i) remittance services via the Lulu Platform; (ii) various value-added services if any authorized by the regulators (collectively referred to as "Services"). For example, certain services such as foreign exchange and remittances are only available once the Customer has gone through the Know-Your-Customer (KYC) process – this is to ensure that all transactions on the Platform are legal and follow the rules set by the AML/CFT Laws and Regulations and Central Bank Directives.

To constantly provide the proper protection to the Personal Data, we may update this Data Privacy Policy periodically to keep it responsive with data privacy requirements, coverage and technology security advancements. The Company adheres to the following key principles with regard to personal data protection. We encourage our customers to check this page from time to time to ensure that they

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are updated and pleased with any changes we made. The Customers are welcome to ask questions, and can email us at customer.care@bh.luluexchange.com

7.3 Why we collect Personal Data

We collect the Customer's Personal Data such as:

- Name, Civil ID & / or passport details,
- Date and place of birth,
- Specimen signature or biometrics,
- Present and permanent address,
- Source of fund or income,
- Bank account and bank statements
- Internet protocol (IP) address, cookies, credentials, browser type and version (Digital data's)
- Occupation, nationality, country of residence & visa status
- Name of employer or the nature or self-employment or business,
- Contact details such as contact numbers and email address,
- Mother's maiden name,
- Marital status

Without limiting the generality of the purpose, to facilitate the Customer's transaction needs and avail of our products and services, among others:

Enhance the Customer's experience and improve, develop, and determine tailored products to meet their preferences and needs; Communicate relevant products and/or advisories to the Customers. Show them relevant advertisements on and off our Services and measure the effectiveness and reach of ads and Services. Abide by any safety, security, public service, or legal requirements and processes, and Process information for statistical, analytical, and research purposes.

Furthermore, we collect the Personal Data to the extent necessary to comply with the requirements of the law and legal process, such as a legal and regulatory obligation of the Anti-Money Laundering Acts, or to prevent imminent harm to public security, safety or order.

We also need the Personal Data for statistical, analytical, and research purposes to create anonymous and aggregate reports, which enables us to provide a better service to each of our customers.

7.4 If you do not provide personal information

If you decline to give us personal information when we want it according to a legal requirement or the conditions of a contract we have with you, we may not be able to carry out the terms of the contract we currently have or are intending to reach contract with you. If this occurs, we may decide to discontinue providing you with a service, but we will notify you instantly.

7.5 Collection of Personal Data

We collect the following types of Personal Data in order to provide the Customer with the usage of the Platform, and to help us personalize and improve the Customer's experience. Information we collect automatically: When the Customer uses the Platform, we collect information sent to us by the Customer's computer, mobile phone or other access device. The information sent to us includes, but is not limited to, the following:

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- Data about the pages they access,
- Computer IP address,
- Device ID or unique identifier,
- Device type,
- Geo-location information,
- Computer and connection information,
- Mobile network information,
- Statistics on page views,
- Traffic to and from the sites,
- Referral URL, ad data, and
- Standard web log data and other information.
- Telephone connections, login/ logout, connection times, use of internet / email, location, cookies

Information the Customer provides to us: We may collect and store any information the Customer provide us when they use the Platform, including when they add information on a web form, add or update the Customer registers with us for the first time on the Platform or uses the Services, we may collect the following types of information:

- Contact information, such as the Customer's name, address, phone, email and other similar information.
- Financial information, such as the full bank account numbers and/or related information that the Customer wishes to link to our Platform or give us when they use the Services.
- Detailed Personal Data such as the Customer's date of birth or national ID number.
- Information from other sources: We may also obtain information about Customers from third parties such as credit bureaus and identity verification services.
- Authentication and Fraud Detection: In order to help protect the Customers from fraud and to prevent misuse of Personal Data, we may collect information about them and their interaction with the Platform. We may also evaluate their computer, mobile phone or other access device to identify any malicious software or activity.

Using Services via Mobile Devices: We may offer the Customers the ability to connect with the Platform using a mobile device, either through a mobile application or via a mobile optimized website. The provisions of this Data Privacy Policy apply to all such mobile access and use of mobile devices.

When the Customer downloads or uses the Platform, or accesses one of our mobile optimized sites, we may receive information about their location and their mobile device, including a unique identifier for their device. We may use this information to provide the Customers with location-based services, such as personalized content based on the geography of the Customer. Most mobile devices allow the Customer to control and/or disable location services in the device's setting's menu. If the Customer has questions about how to disable their device's location services, we recommend them to contact their mobile service carrier or the manufacture of their particular device.

7.6 Use and Storage of Personal Data

- We use Personal Data to provide the Customers with services and products the Customers explicitly request for, to resolve disputes, troubleshoot concerns, help promote safe services, provide Services, measure consumer interest in Services, inform them about offers, products, services, updates, customize their experience, detect, and protect us against error, fraud, and other criminal activity, enforce our terms and conditions, etc. We may occasionally ask the Customers to complete optional online surveys. These surveys may ask the Customers for contact information and demographic information (like postal code, age, gender, etc.). We use this data to customize their experience on the Platform, providing them with suggestions that we think they might be interested in and to display such suggestions according to their preferences highlighted in such surveys.

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- The security of the Customer's Personal Data, in paper and electronic format, is important to us and we take reasonable steps to protect it from misuse, interference, loss, unauthorized access, modification, and unauthorized disclosure by establishing and enforcing organizational, physical and technical security measures. When there is a need for us to store the Personal Data with a third-party data storage provider, we use contractual arrangements to ensure that those providers take appropriate measures that are aligned with the industry best practices in the data privacy and information security industry. We will keep copies of the Customer's registration and transaction records for minimum 10 years in adherence with the requirement of the Central Banks and other countries Laws and Regulations. The Personal Data will be destroyed in irretrievable and unusable form in adherence with our physical and/or technical information security measures when retention is no longer required.
- We will not sell, share, or rent the Customer's Personal Data to any 3rd party or use the Customer's email address/mobile number for unsolicited emails and/or SMS other than for any transactional communication. Any emails and/or SMS sent by us will only be in connection with the provision of agreed services and products and this Privacy Policy. Periodically, we may reveal general statistical information about us and our users, such as number of visitors, number and type of services availed, etc. We reserve the right to communicate the Customer's Personal Data to any third party that makes a legally compliant request for its disclosure.
- Access management policy is in place which ensures a consistent approach to provisioning, transition, and deprovisioning of accesses for both standard users and privileged users throughout the enterprise. Control over these processes allows the organization to ensure only authorized users have access to their systems and information while simultaneously detecting unauthorized access. It also intends to limit access to information and information processing facilities according to their authorization.
- Company shall backup all critical data appropriately using digital means according to the defined RPO and RTO and shall maintain the backup with adequate protection throughout the retention period, in alignment with regulations and contractual requirements. Levels of backup shall be determined as per the data sensitivity, retrievability, contractual / regulatory requirements and business requirements.

7.7 Who we share personal data with

- We rely on third-party companies for IT systems, core applications, and IT support to maintain our systems functioning.
- We utilize SMS entities to communicate with you regarding your accounts, services, direct marketing, and fraud awareness messages on our behalf.
- The Central Bank of Bahrain (CBB), as well as other governmental agencies and ministries, are obligated by law or order to comply with applicable laws.
- If the police or court requests any data,
- External auditors are utilized for auditing purposes.

7.8 Data Retention Policy

- Record of all transactions, customer data, other sensitive digital information must be retained for a minimum period of 10 years.
- Details of data outside of the records indicated above such as standard network logs, access logs, change logs, etc. shall be retained for the period of 10 years.
- Company may retain the data as much as long for any other purpose
- The company may keep the data for an extended period for any additional purpose.

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7.9 Data Sensitivity

We are focused on upholding the highest standards of data preservation for our customers. The sensitive data include:

Personal data type	Description
Contact Information	Address; telephone number; and email address
Personal Information	Customer name(s); Gender; Date of birth / Age of customer; National Identification Number(s); Passport number(s); Driving license number(s); Nationality; Copy of passports, driving licenses, and signatures; Visa
Family Information	Family members and dependents' names and contact information.
Transactional	Information about payments made to and from customer accounts, bank statements.
Employment Information	Industry; Role of employee; Business Activities; Employer details.

7.10 When do we share Personal Data

There are times when we need to share Personal Data, and we would always ask the Customers for their consent, unless it would be used to comply with legal and regulatory mandates set by appropriate government agencies. With the Customer's consent, we would share their Personal Data with contracted third-party service providers for processing, marketing, research, and other specified legitimate purpose. In these instances, we will ensure that the Personal Data will be secured and protected under the terms of a data sharing agreement, or any other relevant agreement made with parties that can demonstrate sufficient organizational, physical and technical security measures to protect Personal Data.

7.11 Rights you have and how you can use them

As per data protection regulations, your personal information may be subject to multiple safeguards. If you wish to utilize these safeguards, you can easily get in touch with us through the contact details provided in the section below or by visiting our branch. We are always here to assist you in any way possible.

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Be notified of processing of your personal data.
- Right to withdraw consent
- Sources from which personal/ sensitive personal data were obtained;
- Reasons for the disclosure of the personal/ sensitive personal data to recipients if any;

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A “cookie” is a small piece of information stored by a web server on a web browser so it can be later read back from that browser. We use cookie and tracking technology depending on the features offered. No Personal Data will be collected via cookies and other tracking technology; however, if the Customer previously provided personally identifiable information, cookies may be tied to such information. Aggregate cookie and tracking information may be shared with third parties.

7.13 The time limit for responses

At our organization, we make every effort to promptly respond to all legitimate requests within 15 calendar days. However, in some cases, such as a particularly difficult request or repeated requests, we may need more than a month to respond completely. We will, of course, keep you informed and updated throughout the process. Our team is dedicated to providing you with the greatest level of care and attention in order to meet your needs.

7.14 Links to Other Sites

Our Platform links to other websites that may collect personally identifiable information about the Customers. We are not responsible for the privacy practices or the content of those linked websites. The Customers are advised to use their discretion while clicking on any such links.

7.15 Data Security

We have stringent security measures in place to protect the loss, misuse, and alteration of the information or Personal Data under our control. Whenever the Customer changes or accesses the Customer’s account information, we offer the use of a secure server. Once the Personal Data is in our possession we adhere to strict security guidelines, protecting it against unauthorized access. Encryption controls shall be implemented as required on critical business applications that might have sensitive information. Confidential data transferred through public networks, or the Internet shall be adequately protected with suitable encryption technologies. We have taken measures to ensure that our IT services provider is certified in accordance with the ISO 27001 standards, which are designed to safeguard our organization's sensitive information.

7.16 Overseas transfers

To provide you with the service, we will transfer your personal data to an IT service provider company located overseas that have data protection laws in place that are considered adequate by the Bahrain Data Protection Laws and takes appropriate safeguards to protect your personal data in accordance with the Personal Data Protection Law Regulations.

7.17 Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

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7.18 Consent

By using and/or visiting the Platform, using our Services and/or by providing the Customer's Personal Data, the Customers consent to the collection and use of the information they disclose on the Platform in accordance with this Privacy Policy, including but not limited to their consent for sharing their information as per this privacy policy.

7.19 Applicant Consent for Job application

Data Privacy and Applicant Consent Statement

By submitting CV or job application to **Lulu International Exchange**, Applicant confirm that the information provided is accurate and authorize the company to collect, process, and use applicants' personal data for recruitment and employment purposes, including verification as needed. Applicants consent to the transfer or processing of applicant's data within or outside the country in line with applicable data protection laws and release the company from any liability arising from such lawful use. Digital resumes are retained for a maximum of two (2) years from the date of submission. After the retention period, all resumes are permanently deleted from company systems and storage locations unless there is a legitimate business or legal reason to retain them longer (e.g., ongoing recruitment or compliance requirements, etc.)

7.20 Withdraw consent

The Customer has the right to withdraw their consent for the processing of their personal data at any time. The withdrawal of consent shall be communicated in writing to us at the contact details provided during the customer registration time. Upon receipt of the withdrawal notice, we shall no longer process the customer's personal data, except as required by applicable laws or legitimate grounds for processing.

7.21 How can Customers access their Personal Data

As we are a transparent organization, the Customers will always have a way to access or correct their Personal Data unless there are practical, contractual, and legal reasons that would prevent us from doing so. We would just need ample time to provide or correct that information for the Customers, but rest assured it would be completed. The Customers can let us know what they think, and if they are in need of any assistance on their data privacy needs or concerns, they can email us at: customer.care@bh.luluexchange.com

8 Data Breach Management

In the event of a personal data breach, the Company will promptly assess the incident, take necessary steps to mitigate the impact, and notify the CBB and affected individuals as required by the PDPL and any guidance issued by the CBB. The Company maintains a data breach response plan to ensure an effective and timely response to such incidents.

9 Employee Responsibilities

All employees of the Company are responsible for complying with this Policy and related procedures. They are required to treat personal data with confidentiality and use it only for authorized purposes. Employees receive training on data protection and are aware of their obligations to protect personal

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data. The Company has designated a Data Protection Guardian (DPG) who is responsible for overseeing data protection matters and ensuring compliance with the PDPL and any related regulations or guidelines issued by the CBB.

10 Compliance & Review

The Company regularly reviews and updates this Policy to ensure its ongoing relevance and compliance with the PDPL, regulations, and guidelines issued by the CBB, and other applicable laws and regulations. Compliance with this Policy is monitored, and any breaches are addressed through appropriate disciplinary measures. The Company cooperates with the CBB in any audits or investigations related to data protection.

11 Our contact details.

Please contact us if you have any concerns or would like more information about how we utilize your personal information. You can reach us at:

Via email at: customer.care@bh.luluexchange.com

Via telephone at: +973 17641290

Via post at: Lulu International Exchange B.S.C (C) Commercial office no. 1086 First floor building 1723 Road 4041 Block 740 PO Box 75154, Area A'Ali

For requests relating to exercising your rights under data protection laws, please contact Mr. Liaqat Baig (Data Protection Guardian) on the following channels:

Via email at: liaqat.baig@bh.luluexchange.com

12 Records

Document	Location	Duration of Record	Responsibility
Records	Branch/Warehouse	Min 10 years	Management

Classification

Public

POL-BH Data Privacy Policy

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Controller Compliance Officer/MLRO
Owner General Manager

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