

Privacy Policy

Last Updated: March __, 2023

Introduction

HOLMED GROUP and its affiliates (collectively "HOLMED GROUP" "us", "we" and "our") understand the importance of safeguarding your personal data and appreciate your trust in us and in our capacity to do so safely and responsibly.

This statement ("Privacy Policy") explains what information we collect and describes our policies and procedures with respect to the collection, use, disclosure and protection of your personal data collected.

Please read this Privacy Policy carefully, so that you understand your rights and our practices in relation to personal data.

Personal data is any information that identifies you as an individual or relates to you as an identifiable individual ("Personal Data").

I- HOW WE COLLECT YOUR PERSONAL DATA

We collect your Personal Data when you Browse or visit our Website:

- We collect non-personal information, which includes your session durations, the content you accessed on the Website, the frequency and scope of your use of the Website and information about your computer and internet connection including the operating system you use and browser type.
- We also may collect information about you through cookies and analytic tools for necessary, analytics purposes.
- Our legal basis for collecting this information is consent and/or our legitimate interest (e.g. using essential cookies).

We collect your Personal Data when you make use of, or interact with, our Website or other HOLMED GROUP platforms:

- We collect information from which you can be personally identified, such as your name, email address, telephone number, company and any other information that you choose to share with us. Personal Information will be collected only if received voluntarily from you or by asking to join our mailing list (if available) or otherwise requesting us to contact you.
- We will collect your Personal Data to respond to your specific request or enquiry and provide you with the services you wish to receive. The collection of such information will enable us to provide you with technical and professional assistance.
- If you subscribe to our mailing list (if available), we will use your data in order to send you (to the email or other contact address you provided on registration) newsletters and updates as well as to update you on marketing and other events that we organize (as well as those organized with or by third parties). You can choose to unsubscribe from our mailing list at any time by clicking the "unsubscribe" link in the relevant communication.

- Our legal basis for collecting your Personal Data is that processing is necessary to action your request prior to entering into a contract and/or our legitimate interest (e.g., to respond to your request).
- We may share this information with third party platforms, such as email platforms and/or hosting provider.

We collect your Personal Data when we process job applications:

- We collect the following information: Full name, email address, phone number, CV or LinkedIn link, and any additional information which you choose to share with us.
- We collect this information to process your job application and to assess you as a candidate.
- Our legal basis for collecting this information is that processing is necessary for the performance of a contract to which you will be a party or prior to entering into a contract, and legitimate interest (e.g. to assess your suitability as a candidate).
- We may share this information with third party platforms, such as recruitment software, email platforms and/or hosting providers.

Your knowledge and consent are required for the collection, use or disclosure of Personal Data except where required or permitted by law. Providing us with your Personal Data is always your choice, as you have the option of not providing your Personal Data when asked to.

II- USE OF YOUR PERSONAL DATA

We may use your Personal Data for various purposes:

- To provide and maintain the Website
- To personalize our website for you
- To allow you to participate in interactive features of our services
- To provide analysis or valuable information so that we can improve our services
- To monitor the usage of our Website
- To detect, prevent and address technical issues
- To keep our Website secure and prevent fraud
- To provide customer care and support and to deal with enquiries and complaints made by you
- To provide you with news, special offers and general information about other goods, services and events which we offer
- To send you email notifications that you have specifically requested
- To provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information)
- To verify compliance with the terms and conditions governing the use of our Website

III- DISCLOSURE OF YOUR PERSONAL DATA

We are committed to maintaining your trust, and we want you to understand when and with whom we may share your Personal Data we collect.

- Sharing of your Personal Data with Third Parties. We may share your Personal Data for the purposes set out in this Privacy Policy. We may also share aggregated or anonymized information in a form that does not directly identify you. Any third parties with whom we share personal data are

contractually required to implement appropriate data protection and security measures to protect personal data and are not permitted to use personal data for any purpose other than the purpose for which they are provided with or given access to personal data.

- Links to other Sites. Our Website may contain links to other third-party sites that are not governed by this Privacy Policy. Although we endeavour to only link to sites with high privacy standards, our Privacy Policy will no longer apply once you leave our website. Additionally, we are not responsible for the privacy practices employed by third-party websites. Therefore, we suggest that you examine the privacy statements of those sites to learn how your information may be collected, used, shared and disclosed.
- Corporate affiliates. We may share your information with our corporate affiliates that are subject to this policy. We may also share Personal Data with our business partners, suppliers and local distributors with whom we collaborate to offer products or services.
- Business Transactions. If HOLMED GROUP is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.
- Disclosure Of Data for Legal Requirements. Under certain circumstances, HOLMED GROUP may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).
- With your consent or at your direction. We may share information for any other purposes disclosed to you at the time we collect the information or pursuant to your consent or direction.

IV- Analytic Tools

Google Analytics. Our Website may use a tool called “Google Analytics” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website. We do not combine the information collected through the use of Google Analytics with Personal Information we collect.

V- Transfer of Personal Data

- Internal Transfers: Transfers within HOLMED GROUP are covered by an internal processing arrangement which ensures that your Personal Data receives an adequate and consistent level of protection to whomever it is transferred.
- External Transfers: Where we transfer your Personal Data outside of Lebanon (for example to third parties who provide us with services).

We will generally take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

VI- Security Of Data

Your Personal Data will be protected by security safeguards that are appropriate to the sensitivity level of the information. We take all reasonable precautions to protect your Personal Data from any loss or unauthorized use, access or disclosure.

However, keep in mind that sending over the internet is not fully secure and hence no matter how we strive to protect your personal information, we cannot guarantee its absolute security, especially when it comes to pirating, or hacking or theft.

VII- Retention Period

We will retain your Personal Data for as long as needed or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject; and (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations).

VIII- Customer Access

Upon request, you will be informed of the existence, use and disclosure of your Personal Data, and will be given access to it. You may verify the accuracy and completeness of your Personal Data, and may request that it be amended, if appropriate. However, in certain circumstances permitted by law, we will not disclose certain information to you.

IX- Updates to this Privacy Policy

The Privacy Policy may be updated from time to time, at our sole discretion, by posting a new privacy policy and by updating the date at the top of this Privacy Policy page. We encourage you to check for changes to this Privacy Policy on a regular basis. Changes to this Privacy Policy will take effect when posted on this page.

X- Inquiries

If you have any questions about this Privacy Policy, please contact us by visiting this page on our Website.