

Keypoint privacy statement

Keypoint is committed to protecting your personal data.

This privacy statement describes the practices we follow to respect data privacy. This privacy statement explains how Keypoint collects and uses personal data, the purpose for which it collects such data and describes the rights you have with respect to your personal data. As Bahrain moves towards the introduction of its personal data protection law, it is important that you understand the terms *personal data* - information which relates to an individual and which identifies that individual (directly or indirectly) such as your name or your contact information – and *sensitive personal data* – such as information connected with or that reveals your race, ethnicity, political or religious views or criminal or health records. If you have any questions regarding the processing of your personal data, please [contact us](#).

Keypoint

The term “Keypoint” referred to in this privacy statement may refer to one or more of our member firms, each of which is a separate legal entity.¹ The data manager collecting and processing the personal data provided by a client or visitor – including to our website www.keypoint.com – is the Keypoint member firm to which the client or visitor has submitted their personal data.

Our website

Registration is not required for you to use our website. If you are simply visiting our website, we do not collect any personal data about you. Should you choose to register and receive ongoing updates from Keypoint, we may contact you to provide you with information about our services, publications and products, or for other marketing purposes such as inviting you to events.

For example, you may choose to register for:

Email alerts

Keypoint offers email alert services, sending subscribers email updates on a regular or periodic basis. If you subscribe, we will collect basic contact information about you, such as your name and email address.

Expressing an interest in working for Keypoint

Our website enables you to register your interest in applying for a vacancy advertised by our executive recruitment function or working for us. We use this information to identify prospective (internal or external) employees and for internal research and analysis purposes, helping us to become better equipped to serve your needs. See the section below on job applicants.

Surveys

Keypoint may conduct surveys. Survey participants may be asked for personal data (such as their name and contact information) in addition to opinions or feedback. The type of information collected in surveys will vary. We may use this information to contact you with information about our services, publications and products, or for other marketing purposes such as inviting you to events.

Thought leadership registration

Keypoint occasionally requires registration in exchange for thought leadership. The type of information collected may vary. Keypoint reserves the right to distribute certain thought leadership materials only to those who supply the requested information.

Event registration

Keypoint tends to use third-party websites to facilitate event registration. The type of information collected varies. Keypoint may share registrant information with third parties in association with the event. Examples of

¹ Keypoint Business Services w.l.l., Keypoint Administration w.l.l., Keypoint Consulting w.l.l. and Keypoint Trust B.S.C.(c), Basic Lines w.l.l., Keypoint Solutions w.l.l., Keypoint Assist S.P.C., Keypoint Investments and BL Assist S.P.C..

"third parties" include hotels, sponsors or co-sponsors, promoters, event organisers (including via third party websites), speakers and panellists. Please check the details provided at individual events to understand fully how your information will be used and retained.

Keypoint alumni

We want to maintain lifelong, mutually beneficial relationships with our alumni. If we invite you to our alumni community, your name, contact details, role, last office, rank, service line and country will be used to create a record for you in our alumni database, unless you have indicated that you are not interested in participating in our alumni program. You can create a more detailed profile and to decide how much additional information you wish to share.

Any personal information that an alumnus submits to Keypoint will only be used to maintain contact with that alumnus, and will not be disclosed to any third party without the individual's express permission.

If you visit our website, there are different categories of personal data that we collect about you:

Information that you provide voluntarily

We collect personal data that you provide voluntarily through our website, for example, when completing online forms to contact us, subscribing to a newsletter, using one of our online benchmark tools, subscribing to receive marketing communications from us, participating in surveys or registering for events that we are organising. The information we collect about you may include:

- Name
- Job title, level, job function or role
- Company or organisation
- Company data
- Contact information, including email address and telephone numbers
- Demographic information, such as industry, country, preferences and interests
- Other information relevant to client surveys or similar research
- Information pertinent to fulfilling our services to you
- Any other personal data that you voluntarily provide to us

We do not intentionally collect sensitive personal data. You are not required to provide, and should not disclose, sensitive personal data anywhere on our website. If you choose to provide any sensitive personal data in this manner, you acknowledge you consent to the collection and processing of this sensitive personal data.

Information that we collect automatically

When you visit www.keypoint.com, we collect certain personal data automatically from your device such as your IP address, device type, unique device identification number, browser type, broad geographic location (on a country or city level) and other technical information. We also collect information about how your device has interacted with our site, including the pages accessed and links clicked. Collecting this information enables us to better understand the visitors who come to our website, where they come from and what content on our website is of interest to them. We use this information for our internal analytics purposes, and to improve the quality and relevance of our site to our visitors.

Our site also uses various social media plugins.

Purposes for which we process your personal data as a visitor to www.keypoint.com

We may process your personal data to:

- Administer and manage our site, including to confirm and authenticate your identity, and prevent unauthorised access to restricted areas of our site
- Personalise and enrich your browsing experience by displaying content that is more likely to be relevant and of interest to you
- Analyse the data of visitors to our website

- Determine the company, organisation, institution or agency that you work for or with which you are otherwise associated
- Develop our business and services
- Provide you with marketing communications, thought leadership and online benchmarking tools
- Conduct benchmarking and data analysis (for example, regarding usage of our site and demographic analyses of visitors of our site)
- Understand how visitors use the features and functions of our website
- Monitor and enforce compliance with applicable terms of use
- Conduct quality and risk management reviews
- Fulfil any other purpose for which you provided information to Keypoint

Legitimate bases for processing personal data of visitors of our website

We rely upon the following legitimate bases to process your personal data:

- Our legitimate interest in the effective delivery of information and services to you and the effective and lawful operation of our businesses
- Our legitimate interest in developing and improving our website and your user experience
- Explicit consent of the visitor

Our clients

When you engage us to provide you with professional services, we collect and use personal data when we have a valid business reason to do so in connection with those services. In the context of providing professional services to clients, we may also process personal data of individuals who are not directly our clients (for example, employees, customers or suppliers of our clients). The majority of the personal data we collect and use to provide our services is supplied voluntarily by (or collected by us from third-party sources at the request of) our clients. The personal data we collect and use should be generally obvious to you, such as:

- Basic information, such as your name, the company you work for, your position and your relationship to a person
- Contact information, such as your address, email address and telephone numbers
- Financial information, such as payment-related information
- Other personal data relating to you or other third parties which you provide to us for the purpose of receiving our services

Given the diversity of the services we provide, we process many categories of personal data.

Purposes for which we process your personal data as a client of Keypoint

We may process your personal data:

- To provide services to you
- To administer our relationship and maintain contractual relations
- For accounting and tax purposes
- For marketing and business development
- To comply with our legal and regulatory obligations
- To establish, exercise or defend legal rights
- For historical and statistical purposes

Legitimate bases for processing personal data of a client of Keypoint

We rely upon the following legitimate bases to process your personal data:

- Explicit consent from you
- Compliance with a legal or regulatory obligation
- To perform our obligations under a contractual arrangement with you

- Our legitimate interests in the effective delivery of information and services to you and in the effective and lawful operation of our business and the legitimate interests of our clients in receiving professional services from us as part of running their organisation (provided these do not interfere with your rights)

Job applicants

We collect information from and about candidates in connection with available employment opportunities at Keypoint as well as third-parties that approach us for executive recruitment purposes. The data we collect includes resumes or CVs, identification documents, academic records, work history, employment information and references. We use your personal data to match your skills, experience and education with specific roles – either internal or external. This information is passed to the relevant persons involved in the recruitment process to decide whether to invite you for an interview. We may collect further information – such as interview notes, assessment results, feedback and offer details – if you are invited to an interview.

We may also collect data where we have a legal obligation to do so with the individual's explicit consent and where permitted by law, such as information about an individual to analyse workforce diversity. Once onboarded, an individual's information may also be used to provide a suitable working environment. We also need to conduct criminal background checks for certain candidates to assess their eligibility to work for us or for our clients.

Our recruitment tools contain their own privacy notices explaining why and how personal data is collected and processed by those applications. We encourage individuals using our recruitment tools to refer to available privacy statements.

We may collect personal data about candidates:

- Directly from candidates – for example, information provided when applying for a position directly through our website
- From recruitment agencies
- Through publicly available sources online – for example, where you have a professional profile posted online (such as on your current employer's website or on a professional networking site, such as LinkedIn)
- By reference – for example, through a reference from a former employee or employer, or from a referee you have identified

Legitimate bases for processing personal data of candidates We rely upon the following legitimate bases to process your personal data:

- Explicit consent of the candidate
- Our legitimate interest in attracting, identifying and sourcing talent
- Our legitimate interest in processing and managing applications, including screening and selecting candidates
- Our legitimate interest in hiring and onboarding candidates by making offers to successful candidates
- Carrying out pre-employment screening checks
- Compliance with a legal or regulatory obligation

Disclosure

Keypoint will only disclose your personal data to third-parties outside of Keypoint:

- When explicitly requested by you
- To perform our obligations under a contractual arrangement with you
- As required by a court order or any other legal or regulatory requirement
- Where the disclosure is reasonably related to the sale or other disposition of all or part of our business

Third-party recipients of personal data may include:

- Professional advisors, such as law firms, tax advisors or auditors
- Insurers
- Audit regulators
- Tax and customs, and excise authorities

- Regulatory and other professional bodies
- Stock exchange and listing authorities
- Public registries of company directors and shareholdings
- Providers of identity verification services
- Credit reference agencies
- The courts, police and law enforcement agencies
- Government departments and agencies
- Service providers

Keypoint has a legal obligation to report suspicious transactions and other activity to relevant regulatory authorities under anti-money laundering, terrorist financing, insider dealing or related legislation. We may also report suspected criminal activity to the police and other law enforcement bodies. We are not always permitted by the law to inform data owners about this in advance of the disclosure, or at all.

Keypoint does not collect or compile personal data for dissemination or sale to outside parties for consumer marketing purposes or host mailings on behalf of third parties.

Transfers of personal data outside of Bahrain

Bahrain's personal data protection law sets out the circumstances under which personal data can be transferred outside of Bahrain. Except in the circumstances described in "Disclosures" above, Keypoint will only disclose your personal information to third parties that have agreed in writing to provide a sufficient level of privacy protection.

Your rights

If Keypoint processes your personal data, you have rights under Bahrain's personal data protection law:

- Enquire: you have the right to enquire and be notified of the details of the personal data we are holding about you.
- Complain: you have the right to submit a complaint to the data protection authority if you believe that Keypoint has breached the law.
- Object: you have the right to object, free of charge, to the processing of your personal data for direct marketing purposes. You also have the right to object to processing that causes substantial and unwarranted harm or distress to you or others or in instances where a decision is taken based only on automated processing of personal data.
- Rectify, block or erase: you have the right to rectify, block or erase your personal data if the processing is done in contravention of the law and, if the data is incorrect, incomplete or not updated.

You also have other rights, including the right to withdraw consent at any time.

If you would like to request or exercise any of these rights, please [contact us](#) and we will make reasonable and practical efforts to comply so long as it is consistent with applicable law and regulations.

Retention

Once registered, your personal data will be stored in our customer relationship management (CRM) system. If you choose not to receive future material from Keypoint, your contact details will remain on our opt-out list to prevent you receiving further publications from Keypoint.

Our policy is to retain personal data only for as long as it is needed. Retention periods are set in accordance with local regulatory and professional retention requirements. To meet our professional and legal requirements, to establish, exercise or defend our legal rights, and for archiving and historical purposes, we may need to retain information for significant periods of time.

Cookies

A "cookie" is technology that allows Keypoint to store tokens of information (an 'identifier') in your browser used only by our website while you are visiting. Cookies are not used to determine personal identities - they help us track traffic patterns to determine a user's preferred location and language so that we can direct them to the most appropriate page when they visit. Our website uses cookies and other web technologies to improve performance and to enhance your browsing experience. We may at times also use cookies to understand more about you so we can offer you a more personalised browsing experience.

If you do not want to receive cookies, you can set your browser to notify you when you receive a cookie so that you may determine whether to accept it or not. Be aware that turning off 'cookies' may impact your user experience.

Social media platforms

You may wish to participate in the various social media platforms hosted by Keypoint. The main aim of these social media platforms is to facilitate and allow you to share content. Keypoint cannot be held responsible if you share personal data on social media platforms that is subsequently used, misused or otherwise appropriated by another user.

Keypoint may also provide links to other social media platforms maintained on separate servers by individuals or organisations over which Keypoint has no control. Keypoint makes no representations or warranties regarding the accuracy or any other aspect of the information located on such servers. A link to a third party's social media platform should not be construed as an endorsement by either Keypoint or that third party of the other of its products and services. Keypoint makes no representations or warranties regarding how user data is stored or used on third-party servers. We recommend reviewing the privacy statement of each third-party site to determine their use of your personal data.

Other websites

Keypoint may provide links to other websites maintained by individuals or organisations over which Keypoint has no control. Keypoint makes no representations or warranties regarding the accuracy or any other aspect of the information located on such websites. A link to a third party's website should not be construed as an endorsement by either Keypoint or that third party of the other of its products and services. Keypoint makes no representations or warranties regarding how user data is stored or used on third-party servers. We recommend reviewing the privacy statement of each third-party site to determine their use of your personal data.

Children

Keypoint's website is not intended for use by children. We understand the importance of protecting children's information, especially in an online environment, and we do not knowingly collect or maintain information about children.

Keeping your data up-to-date

We work hard to maintain the accuracy and completeness of the personal data we hold. It is important that you inform us of any updates to your personal data so that we have the most up-to-date information about you. Please contact your regular Keypoint contact to update your personal details.

Security

Keypoint works to protect the confidentiality and security of personal data it obtains in the course of its business. Keypoint has implemented generally accepted standards of technology and has policies and procedures in place designed to safeguard and protect personal data against unintentional or unauthorised destruction, accidental loss and unauthorised alteration, disclosure or access or any other form of processing loss.

Notwithstanding this, despite Keypoint's best efforts, we cannot absolutely guarantee the security of data against all threats. To the best of our ability, access to your personal information is limited to authorised persons. Such persons who have access to your personal data are required to maintain the confidentiality of such information.

Changes to this privacy statement

This privacy statement was last updated on 1 August 2019. Keypoint may update this privacy statement at any time.

Contact us

Keypoint gives you choices regarding the collection and usage of your personal data. If you have previously registered for Keypoint-related updates and no longer wish to receive e-mails from us, please unsubscribe using the opt-out option on any of our updates.

If you are concerned about an alleged breach of the personal data protection law or any other privacy law or regulation by Keypoint, please [contact us](#). If you are not satisfied with the way in which Keypoint has resolved your complaint, you have the right to complain to the data protection authority in your country. You may also refer the matter to a court of competent jurisdiction.

If you have questions or you do not feel that your concerns have been addressed in this privacy statement, please contact us at one of [our offices](#).