



InnovO Privacy Policy

This is Innovo's ("**InnovO**", "**we**", "**us**" or "**our**") data protection and privacy policy ("**Policy**"). It explains who we are, and why and how we process your personal information (also referred to herein as personal data). It also explains your rights and how to contact us if you need to. Our contact details are set out at the end of this Policy.

Each of the Innovo group companies are independent controllers in relation to the personal data processed pursuant to this Policy. Any reference to "**you**" or "**your**" refers to anyone whose personal information we process.

This Policy applies to all individuals whose personal information is processed by Innovo Management Services LLC's or any other company in the Innovo group of companies ("**InnovO**", "**we**", "**us**" or "**our**"), save for recruitment activities (where our Recruitment Privacy Notice applies) and for current and past staff (where our Staff Privacy Notice applies). A list of those companies is set out at the end of this Policy.

This Policy provides you with certain information that must be provided under the UAE's Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data ("**PDPL**"), the EU's General Data Protection Regulation ("**EU GDPR**") and the United Kingdom's General Data Protection Regulation ("**UK GDPR**").

This Policy is non-contractual, and we amend it from time to time. Please visit [Privacy & Cookie Policy | InnovO Group](#) if you want to stay up to date, as we will post any changes here.

1. When do we collect personal data?

We will collect personal data from you whenever you engage with us, which includes but is not limited to:

- when you visit our website; and
- whenever you get in touch with us (including through e-mail, our website, social media, through our customer service telephone number or otherwise).

We also collect personal data about you from third parties, including suppliers, professional advisers, credit reference agencies, information security vendors, tax authorities, government agencies and regulatory bodies, where they share such information with us. Specific sources for each data category are set out in the table in Section 2 below.

2. What personal data do we collect?



We collect and process different types of personal information, which we set out in the table below together with the source of such information. This personal information falls into categories as detailed in the table below and derives from one or more of the following sources:

- **“You”** – for example, through contact forms on our websites, emails or other messages you send us, information you share in meetings or other contacts with us.
- **“IT systems”** – this covers information collected automatically via Innovo devices and IT systems.
- **“Third-party sources”** – this includes investor contacts, suppliers, professional advisers and other third parties like tax authorities, where they share information about you with us.

Data categories	Details	Sources
Identity and contact data	• Full name • Occupation, including job function and department • Address • Phone number • Email address • Other contact details • Marital status • Passport (and/or other identification documents) and visa information • National Insurance number • Nationality, citizenship and place of birth	• You
Monitoring and communications data	Information arising from your use of Innovo’s information and communication systems, including: • Any documents, products, communications or voicemails/voice messages created, stored or transmitted using Innovo’s systems, or that you give us by phone, email, via our website, via social media or otherwise • Information we obtain when you enquire about a development or project or contact us to report a problem • Information provided when doing any of the above on behalf of the person that you work for	• You • IT Systems • Third parties (e.g. information security vendors)
Contract and transactional data (customers	• Other information relating to you which it is necessary for us to process in order to enter into or perform a contract with you or the company you	• You • Third parties • IT Systems



and prospective customers)	work for, if you are purchasing or interested in purchasing a property, or engaging our services • Employment details and right to work information • Information obtained from credit reference agencies	
Site and premises visit data	• Information relating to you that you give us or we otherwise obtain when you visit our sales or marketing suite, construction site, or any event or premises relating to a development or project (for example, if you sign in, are recorded on CCTV)	• You • Third parties (e.g. information security vendors)
Policy compliance	• Details and copies of your acceptance of Innovo policies (e.g. in relation to conflicts of interest or acceptable usage)	• You • IT Systems • Third parties
Technical and usage data (website visitors)	• IP address, login information, browser type/version, time zone and plug-in settings, and operating system and platform • URL and clickstream data, including pages viewed, response times and errors, time spent on pages, on-page interactions (e.g. scrolling, clicks, mouse-overs), and how you leave our website	• You • IT Systems

3. On which legal basis and for which purposes do we process personal data?

We collect your personal information primarily in the context of supplying our property and construction services and to enable us to meet our contractual and legal obligations, including both to you and third parties.

Further information about the specific purposes for which we process your personal information and the legal justification we rely upon for such processing is set out in the table below.

Purpose	Data categories	Processing ground in the UK/EU
To identify you and communicate with you about your enquiries and our property and	• Identity and Contact data • Monitoring and communications data	• For our legitimate interests in responding to enquiries and communicating with prospective and existing customers about our property



construction services		and construction services (Under Article 6(1)(f) UK GDPR/EU GDPR) • To perform a contract with you or the company you work for, where you have engaged us or entered into an agreement with us, or to take steps at your request prior to entering into a contract (Under Article 6(1)(b) UK GDPR/EU GDPR)
To send you marketing and promotional communications	• Identity and Contact data • Monitoring and communications data	• Your consent to receiving marketing or promotional material (Under Article 6(1)(a) UK GDPR/EU GDPR)
For contract performance or to help with the day-to-day administration of the business	• Identity and Contact data • Contract and transactional data (customers and prospective customers) • Monitoring and communications data	• To perform our contract with you or the company you work for, or to take steps at your request prior to entering into a contract (Under Article 6(1)(b) UK GDPR/EU GDPR) • For compliance with our legal obligations, including anti-money laundering, right to work and other regulatory checks (Under Article 6(1)(c) UK GDPR/EU GDPR)
To facilitate any actual or potential sale, merger, acquisition, disposal, reorganisation or similar corporate transaction, including related due diligence and the assessment of assets and liabilities	• Contract and transactional data (customers and prospective customers)	• For our legitimate interests in facilitating corporate transactions and evaluating and completing them efficiently (Under Article 6(1)(f) UK GDPR/EU GDPR)
To prepare and send you	• Identity and Contact data	• For our legitimate interests in communicating effectively with you

communications (for example, using communications advisers and printers), and to obtain professional advice and services and audit our business practices and providers		and in obtaining professional advice and services in the proper running of our business (Under Article 6(1)(f) UK GDPR/EU GDPR)
To manage your visit to our sales/marketing suite, construction site or other premises or events, including site security and health and safety	• Site and premises visit data	• For our legitimate interests in ensuring the safety and security of our visitors, staff and premises, including construction sites (Under Article 6(1)(f) UK GDPR/EU GDPR) • For compliance with our legal obligations relating to health and safety on construction sites (Under Article 6(1)(c) UK GDPR/EU GDPR)
To operate and maintain the security of our website when you connect to it	• Technical and usage data (website visitors)	• For our legitimate interests in ensuring the security and proper functioning of our website (Under Article 6(1)(f) UK GDPR/EU GDPR) • For compliance with our legal obligations, where applicable (for example, under applicable cookie and e-privacy laws) (Under Article 6(1)(c) UK GDPR/EU GDPR)
To analyse and improve our website and understand how visitors use it.	• Technical and usage data (website visitors)	• For our legitimate interests in analysing and improving our website and understanding visitor engagement (Under Article 6(1)(f) UK GDPR/EU GDPR)
Legal and regulatory	• Identity and Contact data • Policy compliance	• For compliance with our legal obligations (Under Article 6(1)(c) UK GDPR/EU GDPR)



compliance, including: (i) complying with our obligations in connection with the detection of crime; and (ii) the collection of taxes or duties	• Monitoring and communications data • Contract and transactional data	• For our legitimate interests in making disclosures of personal data in response to requests from bodies carrying out public tasks, and the detection, investigation or prevention of crime (Under Article 6(1)(f) EU GDPR and Article 6(1)(ea); paragraphs 1 and 5, Annex 1, UK GDPR)
IT and communications monitoring, including intercepting and monitoring communications on Innovo systems or devices	• Monitoring and communications data	• For our legitimate interests in preventing unauthorised use of our information and equipment and protecting our business interests (Under Article 6(1)(f) UK GDPR/EU GDPR) • For our legitimate interests in making disclosures of personal data in response to requests from bodies carrying out public tasks, and the detection, investigation or prevention of crime (Under Article 6(1)(f) EU GDPR and Article 6(1)(ea); paragraphs 1 and 5, Annex 1, UK GDPR)
To help us establish, exercise, or defend legal claims	• Any of the above categories as relevant to the particular claim	• For our legitimate interests in establishing, exercising and defending our legal rights (Under Article 6(1)(f) UK GDPR/EU GDPR) • For the establishment, exercise or defence of legal claims where special category data is involved (Under Article 9(2)(f) UK GDPR/EU GDPR)

Where we perform processing activity based on legitimate interests under Article 6(1)(f) UK GDPR or EU GDPR, we will ensure that there is a proper balance between Innovo's legitimate interests and your legitimate interests, fundamental rights and freedoms.



We will only use your personal data for the purpose for which it was collected, unless a new purpose is reasonably compatible with the original one. If we need to use it for an unrelated purpose, we will notify you and explain the legal basis for doing so.

If you choose not to provide personal data that we have requested, this may affect our ability to achieve the purposes set out in the table above. Except where we process your personal information on the basis of consent or our legitimate interests, the personal information we request from you is required for contractual or statutory reasons, as indicated by the applicable legal basis.

4. Who we give your information to

We may share your personal data externally with third parties who process data on our behalf to the extent necessary for the purposes described in this Policy.

All of our third-party service providers and other entities in our corporate group are required to take appropriate security measures to protect your personal information in line with our policies.

Your personal data will only be used by third-party service providers for the purposes outlined in this Policy, and we do not allow our third-party service providers to use your personal data for their own purposes.

The recipients with whom we may share your data are as follows:

Recipients	Purposes	Data categories
Related entities – our group companies	• Legal and regulatory compliance	• Identity and contact data • Monitoring and communications • Policy compliance
Business partners, customers, suppliers and sub-contractors	• For contract performance or to help with the day-to-day administration of the business • Site and premises visit data	• Identity and contact data • Contract and transactional data • Monitoring and communications • Policy compliance
Regulatory bodies and government agencies (including immigration)	• Legal and regulatory compliance	• Identity and contact data



authorities) with jurisdiction over our activities	• To help us establish, exercise, or defend legal claims	
Communications advisers and printers	• To prepare and send you communications (for example, using communications advisers and printers), and to obtain professional advice and services and audit our business practices and providers	• Identity and contact data • Monitoring and communications data
Third parties connected with any sale, merger, acquisition, disposal, reorganisation or similar change	• To facilitate any actual or potential sale, merger, acquisition, disposal, reorganisation or similar corporate transaction, including related due diligence and the assessment of assets and liabilities.	• Identity and contact data • Monitoring and communications data
Contractors and service providers who we use for our business operations – such as IT providers, background and reference checkers, and professional advisers who need access to provide specific services to us including, in particular:	• To obtain professional advice and services and audit our business practices and providers • IT and communications monitoring	• Identity and contact data • Contract and transactional data • Monitoring and communications data • Technical and usage data (website visitors)



Avepoint Deutschland GmbH, Germany	• Storage of personal information including back-ups	• All data types
Decode Services Ltd, UK	• Cybersecurity and forensics support	• All data types
Microsoft, Ireland	• Storage of personal information and office suite software	• All data types
Oracle Corporation	• Storage of personal information and Oracle fusions software	• All data types
Analytics and search engine providers	• To analyse and improve our website and understand how visitors use it, subject to the cookie section of the Policy	• Technical and usage data (website visitors)
Other third parties – where necessary to comply with our legal obligations	• Legal and regulatory compliance	• Any of the above categories as relevant to the particular obligation

5. Where do we store your information?

The data that we process in relation to you may be transferred to, and stored at, a destination outside the home jurisdiction in which you work or live. So, for example, where you work or live in the UK, we may store your information in a location outside the UK. Where you work or live in Dubai, we may store your information outside Dubai. We store information where we have offices, including the EEA, UAE, Egypt and Canada.

International Transfers

Sometimes we will transfer your personal data to countries outside the UK, EEA or UAE. In particular, your personal data may be transferred: (i) from the UK and EEA to the UAE (where we are based); (ii) from the UAE to the UK or EEA (where your data is located from time to time); or (iii) from the UK to the EEA and vice versa. We may also transfer your personal data to countries outside the UK, EEA and UAE from time to time.



If we transfer your personal data to a third party in another jurisdiction, we will do so in accordance with applicable law and will, where necessary, put in place appropriate or suitable safeguards to protect your personal data. In particular, we will only transfer your personal data where:

- (i) the relevant government or regulator has decided that the jurisdiction in which the third party is established has adequate protective rules in relation to data protection in place; this is the case for all our transfers of personal data from the UK to EEA, and from the EEA to the UK;
- (ii) we have otherwise implemented appropriate safeguards, such as standard contractual clauses, with the recipient of your personal data (these are a set of obligations about how your data is protected and used); we use standard contractual clauses for all our transfers from the UK and EEA to Dubai, making use of the European Commission's approved standard clauses, with the addition of the UK addendum for transfers from the UK; or
- (iii) we can rely on another basis under the law, such as the sharing of personal data being necessary for the purpose of a court case, investigation or to protect our legal rights, or a specific derogation applies in relation to the transfer.

If you require further information on the specific countries to which we transfer your personal data or the appropriate safeguards implemented to protect your personal data for any specific transfer, please contact us using the details at the end of this Policy.

6. How we protect your personal data

We have implemented appropriate security measures to prevent your personal information from being accidentally lost, used, accessed, altered or disclosed without authorisation. Access is limited to individuals with a business need-to-know, who are bound by strict confidentiality obligations and act only on our instructions.

7. Cookies and other technologies

These are small pieces of code that a website transfers to, or accesses from, your device. They let us recognise your device, remember your preferences, and manage website features and personalised content. We also use them to distinguish you from other users, which helps us improve your experience of our website.



Cookie removal and more information

You can always modify your browser so as not to accept cookies or to notify you when cookies are sent to it. For more information about cookies including removing any or all of your cookies, please visit <http://www.allaboutcookies.org>. Please note, however, that by blocking or deleting cookies used on our website, you may not be able to take full advantage of the website.

8. How long we keep your information

We will retain and process information about you for as long as you continue to use or express an interest in our services. We will only keep your information for a longer period where necessary in order to comply with our legal obligations.

Please note that we may anonymise your personal information or use it for statistical purposes. We keep anonymised and statistical data indefinitely, but we take care to ensure that such data can no longer identify or be connected to any individual.

9. Your rights

You have a number of rights in relation to your personal information. Your rights are important to us. These rights are:

- **Access:** to be provided with a copy of your personal data held by us;
- **Rectification:** to request the rectification of your personal data held by us;
- **Erasure:** to request the erasure of your personal data held by us, except if we need to retain your personal data to comply with a legal obligation;
- **Restriction:** to request that we restrict the processing of your personal data (while we verify or investigate your concerns with this information, for example);
- **Portability:** to request to obtain your personal data in a structured, electronic format;
- **Objection:** to object to the further processing of your personal data, including the right to object to the processing of your personal data for direct marketing purposes;
- **Withdrawing consent:** where the processing of your personal information by us is based on consent, you have the right to withdraw that consent without detriment at any time, free of charge;
- **Complaint:** If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with



applicable law, you may be able to complain to the data protection regulator in your country.

In the UK, where these rights exist, you have the right to lodge a complaint with us as well as a right to complain to the ICO, which is the relevant data protection regulator. Their helpline number is: 0303 123 1113 or there is an online form available at <https://ico.org.uk/make-a-complaint/data-protection-complaints/>.

You can also contact them in writing:

ICO

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Please note that not all of these rights are absolute rights; some of the rights only apply in certain circumstances, and we have the right to refuse to comply with certain requests.

10. How to exercise your rights

You can also exercise the rights listed above at any time by contacting us at compliance@innovogroup.com.

11. Changes to this policy

Any changes we make to our Policy in future will be posted on our website at [Privacy & Cookie Policy | Innovo Group](#) and any future changes or additions to the processing of personal data as described in this Policy affecting you will be communicated to you through an appropriate channel, depending on how we normally communicate with you.

This Policy was last updated on 2 September 2026.



12. Contact us

Our full details are:

Innovo Management Services L.L.C

Office 305, Dubai Hills Business Park 1

Dubai Hills Estate, Dubai Hills, Dubai

PO Box 52930

Dubai

United Arab Emirates

Innovo Holding Limited

1st Floor Arthur Stanley House

40-50 Tottenham Street

London

W1T 4RN

United Kingdom

You may also contact Innovo Management Services L.L.C's designated UK representative using the contact details set out below:

Name: Innovo Holding Limited

Call: +971 (0) 4 666 5600

Email: info.london@innovogroup.com

Mail: 63 St James's Street, London, SW1A 1LY, United Kingdom



List of Innovo Group Companies

- Innovo Management Services L.L.C (UAE)
- Innovo Holding Limited (UK)
- Innovo Canada Inc (Canada)
- Innovo Canada Management Inc. (Canada)
- Innovo Build L.L.C (UAE)
- Innovo Roads, Infrastructure and Marine Works L.L.C (UAE)
- Innovo Roads, Infrastructure and Marine Works – Sole Proprietorship L.L.C (UAE)
- Innovo MEP Electromechanical Works L.L.C (UAE)
- Innovo Switchgears Manufacturing L.L.C (UAE)
- Innovo Integrated Facilities Management and Sustainable Solutions L.L.C (UAE)
- Innovo Technology Services L.L.C (UAE)
- ASGC Construction L.L.C – Egypt branch (Egypt)
- Innovo Build SAE (Egypt)
- Innovo Construction SAE (Egypt)
- Innovo Solutions Limited (UK)
- Innovo Solutions Trading L.L.C (UAE)
- Innovo for Distribution and Commercial Agencies L.L.C (Egypt)
- Innovo Projects DMCC (UAE)
- Innovo Management L.L.C (Egypt)
- Innovo Developments Limited (UK)
- Innovo Development Management Limited (UK)
- Solinq Trading Limited (UK)
- Innovo Real Estate Development L.L.C (UAE)



- Innovo Development SAE (Egypt)
- Innovo Jersey Ltd (UK)
- Innovo Ventures Limited (UK)
- Innovo SN Limited (Senegal)
- Innovo Projects AO Limited (Angola)
- Innovo Projects Limited (UK)
- Innovo For Distribution L.L.C (Egypt)