Data Privacy and Cookie Policy

Version 1.0 - 01 April 2019
Policy Description and Objectives

The Data Privacy and Cookie Policy sets out details to external users in respect of the collection and use of personal information by Expo 2020 Dubai which takes place on its digital platforms. This Data Privacy and Cookie Policy is intended for external use and the policy text below will be published across Expo 2020 Dubai websites, mobile applications and other digital platforms.

Data Privacy and Cookie Policy

1. EXPO DUBAI 2020 LLC.-SO ("EXPO 2020 DUBAI") DATA PRIVACY AND COOKIE POLICY

1.1 The entity responsible for your Personal Data is Expo 2020 Dubai.

1.2 Expo 2020 Dubai is a Limited Liability Company incorporated in the Emirate of Dubai, United Arab Emirates whose principal place of business is located at PO Box 2020, Dubai, United Arab Emirates.

1.3 Expo 2020 Dubai, and our affiliates and branch offices (also referred to as "we" and "us"), take our data protection and privacy responsibilities seriously. This Data Privacy and Cookie Policy ("Privacy Policy") describes how we collect, process, use, disclose and transfer your Personal Data as a "data controller". A "data controller" is an entity which determines why and how it processes personal data it possesses. This Privacy Policy covers instances when you contact us, use our services and products or interact with our websites, such as www.expo2020dubai.com, and any Expo 2020 Dubai mobile applications (together "Expo 2020 Dubai Websites").

2. TERMS OF USE

2.1 Use of the Expo 2020 Dubai Websites is subject to our Terms and Conditions ("Terms"). By consenting to this Privacy Policy, in addition to acknowledging and agreeing to the terms of this Privacy Policy, you also agree to be bound by the Terms. Please ensure you read them carefully and understand them before consenting to this Privacy Policy.

3. UPDATES

3.1 We may amend this Privacy Policy from time to time to keep it up to date with legal requirements and the way we operate our business. Please regularly check these pages for the latest version of this Privacy Policy. If we make material changes to this Privacy Policy, we will seek to inform you by either updating the date at the top of the page or by notifying you on our website or by email.

4. THIRD PARTY WEBSITES

4.1 Expo 2020 Dubai Websites may link you to other websites, including those of our partners, advertisers and affiliates. We are not responsible for the way in which third party websites operate or the way in which they may process any Personal Data, which you provide to them. It is important that you understand this and check their respective privacy policies and terms of use.
4.2 We may also, from time to time, partner with advertising networks and other online advertising providers in order to deliver advertisements on our behalf or on behalf of other non-affiliated parties on our websites and across the Internet. These advertisements may be presented to you based on products and services the advertising providers think are relevant to your interests. These preferences may be inferred based on information collected about your browsing behaviour on our websites and other non-affiliated sites and apps across time.

5. WHAT PERSONAL DATA WE COLLECT AND WHEN AND WHY WE USE IT

5.1 What is Personal Data

5.1.1 Personal Data in this Privacy Policy means any information relating to an identified or identifiable natural person (a ‘data subject’). An identifiable natural person is a person 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.

5.2 Purchasing tickets or other Expo 2020 Dubai products

5.2.1 If you use the Expo 2020 Dubai Websites to purchase tickets, Expo 2020 Dubai merchandise etc., we will collect and use information about you as necessary to manage the purchase. This may include Personal Data such as your name, date of birth, address, contact information (such as phone number and e-mail address), as well as information collected about your navigation patterns on our websites. We may also seek to collect from you special categories of information in order to enhance your purchase and visitor experience. These special categories of information may include details such as whether you use a wheelchair and whether you have any food preferences or dietary requirements.

5.3 Customer Support and online services

5.3.1 If you contact us by way of email, live chat, message boards or any other facility made available by Expo 2020 Dubai with a query or comment about any of our services or products, or would like us to keep you informed about latest news and developments at Expo 2020 Dubai through our newsletter or other means (for example, direct marketing), we will need to collect information about you (including your contact details) to help us respond to your query or request or provide our services to you. We may do this when you call our customer support centre, or interact with us through our online support tools. This information may include identification data (such as your name, date of birth, gender, nationality etc.), contact details (such as email address and telephone number) and other information (such as your interests and personal preferences and transaction history).
5.3.2 We may also keep a record of any communications we have with you (including a recording of any calls you make). We do this to help monitor and improve the quality of our customer support services, to make and defend legal claims, and to comply with legal obligations to which we are subject.

5.4 Creating registered accounts on Expo 2020 Dubai Websites

5.4.1 There are a number of sections of the Expo 2020 Dubai Websites which we require you to register for in order to be able to make full use of the services available under them.

5.4.2 If you register with us to create an Expo 2020 Dubai Websites account, we may process your personal data to:

5.4.2.1 Manage your access to certain parts of Expo 2020 Dubai Websites and, if applicable, allow you to make certain purchases (such as tickets and merchandise) or receive certain services;

5.4.2.2 Send you newsletters and marketing and promotional materials (including via social media, based on the contact details you provide us), subject to your marketing preferences;

5.4.2.3 If you purchase a ticket from us, to help you to create personalized pathways through the Expo 2020 site on the basis of your preferences which we will have ascertained from your navigation of Expo 2020 Dubai Websites and, once you are on the Expo 2020 site, through location tracking carried out through our mobile application; and

5.4.2.4 Offer you the opportunity to download digital souvenirs following your visit to Expo 2020 (if applicable).

5.4.3 If you register with us to create an Expo 2020 Dubai Websites account, the Personal Data we will collect from you may include identification data (such as your name, age, gender and country of residence), contact details (such as your email address, phone number and address), your preferences (which we can ascertain from the way in which you have navigated the Expo 2020 Dubai Websites), and may also include professional information about you and your photo. If you choose to register an account with us by using a third party app (such as Facebook or Twitter), you will be presented with a dialogue box which will ask your permission to allow Expo 2020 Dubai to access your Personal Data from that third party app (e.g. your full name, date of birth, email address and any other information you have made publicly accessible). Please note that any information that is not required will not be retained by Expo 2020 Dubai.

5.4.4 If you create an account with us, we may use your Personal Data to verify your identity when using the Expo 2020 Dubai Websites. We may also use your contact details to send you transactional and other non-marketing email messages pertaining to your account and provide certain other account maintenance services to facilitate your transactions.
with Expo 2020 Dubai and/or your use of the services we offer on Expo 2020 Dubai Websites.

5.5 **Events and Promotions**

5.5.1 From time to time we hold events and special promotions to introduce Expo 2020 Dubai to interested parties. If you come to one of these events, or take part in a promotion, we may ask for your personal details to help us run the promotion and keep in touch with you about our services and any special offers or competitions that we think may be of interest. Any information which you provide will be used in accordance with the terms of this Privacy Policy and you can unsubscribe from further communications from us at any time.

5.6 **Participation in Expo 2020 Dubai as a volunteer**

5.6.1 If you use Expo 2020 Dubai Websites to apply to become a volunteer, we will collect and use information about you as necessary to manage the application process and, if successful, your participation in the volunteering program. This may include communicating information with you which we deem to be of relevance to your participation in Expo 2020. The Personal Data we collect from you may include your name, date of birth, address, nationality, next of kin details, identification information (such as your Emirates ID number), contact details (such as phone number and e-mail address), information about your health (such as whether or not you have a disability and dietary requirements), biometric information (such as your height and weight), employment and education history and third party data about you, for example, your Twitter, Facebook or other social media profiles.

5.7 **Participation in Expo 2020 Dubai**

5.7.1 If you contact us with a view to becoming a business partner of Expo 2020 Dubai or to attend Expo 2020 in a business capacity, we will need to collect information about your business, which may include Personal Data (for example, your contact details) to help us respond to your query or request. We may do this when you call us, or interact with us through our online support tools. The information we collect may include for example your name, date of birth, address, email, telephone number, your photograph, passport details, visa details (if applicable), bank account details.

5.8 **Expo 2020 grant programmes**

5.8.1 If you contact us to participate in one of our grant programmes, such as Expo Live, we may collect information about you to help us respond to your query or request. We may do this when you interact with us through our online tools. This information may include your name, date of birth, address, email, telephone number, country of residence, educational and professional experience. We may also need to collect from you special
categories of information, for the purposes of properly handling your application, which are treated with extra care by us. These special categories of information may include details such as whether you use a wheelchair, and your race and ethnicity.

5.9 Additional information

5.9.1 Sometimes we will require you to provide additional Personal Data. When we do this we will provide further information about why we are collecting it and how we will use it. Where we provide personalized content, we may ask your permission to review third party data about you, for example, your Twitter, Facebook, LinkedIn, Google+, Weibo, WeChat to get to know you better and to provide more effective personalization.

5.10 Information posted by you

5.10.1 The information posted by you on public areas of Expo 2020 Dubai Websites or elsewhere on the internet may be used by anyone including Expo 2020 Dubai.

5.11 Automatic Collection

5.11.1 Expo 2020 Dubai and third parties that provide content, advertising, or other functionality on our services, may use cookies, pixel tags, local storage, and other technologies to automatically collect information through the services. These are collected for the purposes of:

5.11.1.1 Developing the design and style of our products and services to make improvements;

5.11.1.2 Carrying out statistical, technical and logistical analysis and strategic development;

5.11.1.3 Carrying out market research;

5.11.1.4 Understanding more about you such as your location and demographic information; and

5.11.1.5 Providing you with personalised services, such as recommendations on our websites, apps and in direct marketing and tailored advertising.

5.11.2 Expo 2020 Dubai Websites collect information about how you use our content online, and the device(s) you use to access the site. This includes collecting unique online identifiers such as IP addresses, which are numbers that can uniquely identify a specific computer or other network device on the internet.

6. LEGAL BASIS FOR USING YOUR DATA

6.1 We will only collect, use and share your Personal Data where we have an appropriate legal basis to do so. Depending on where you are, appropriate legal bases may include:
6.1.1 where we need to use your Personal Data to perform a contract or take steps to enter into a contract with you;

6.1.2 our legitimate interests as an organisation, for example we may use customer contact information to keep our customers informed about changes to the Expo 2020 Dubai and other important service messages; in these cases we will respect your privacy rights and ensure you may object to processing as explained in the "Your Rights" section (section 12) below;

6.1.3 where we need to use your Personal Data to comply with a relevant legal or regulatory obligation that we have; and

6.1.4 where we have your consent to use your Personal Data for a particular activity. If you are a data subject in the UAE, this will always be the legal basis upon which your Personal Data will be processed.

6.2 If you would like to find out more about the legal bases upon which we process Personal Data please contact us.

7. HOW WE SHARE INFORMATION WITH OTHERS

7.1 We work closely with a number of trusted partners with whom we may need to share your Personal Data to help us provide our services, such as:

7.1.1 banks and payment providers, to authorise and complete payments;

7.1.2 international participants, to help manage access to their pavilions and for analytics purposes, if you sign up for fast pass entry into pavilions; and

7.1.3 third parties who help manage our business and deliver services. For example, these may include IT service providers who help manage our IT and back office systems, or third party booking agents.

7.2 We may share your Personal Data with our partners who may send you marketing and promotional information.

7.3 From time to time we may share information about you with government organizations and agencies, including international organisations, to comply with applicable laws, regulations and rules, and legitimate requests from law enforcement, regulatory and other governmental or international agencies, or when to do so is in our legitimate interests, even if we are not compelled to share that information by applicable law.

7.4 If, in the future, we sell or transfer some or all of our business or assets to a third party, we may disclose or transfer information to a potential or actual third party purchaser of our business or assets.
8. **MORE ABOUT DIRECT MARKETING, PROFILING AND AUTOMATED DECISION MAKING**

8.1 **Direct marketing**

8.1.1 We are committed to keeping you informed about Expo 2020 and our products and services in line with your personal preferences.

8.1.2 We will usually send this by email but we may choose to contact you in other ways for example by phone, post, SMS and/or other electronic means if that is more appropriate.

8.2 **Managing your marketing preferences**

8.2.1 To protect privacy rights and to ensure you have control over how we manage marketing with you:

8.2.1.1 we will take steps to limit direct marketing to a reasonable and proportionate level and only send you communications which we believe may be of interest or relevance to you;

8.2.1.2 to stop receiving marketing material from us, you can click the "unsubscribe" link that you will find on any electronic communications which you receive from us, or, for other types of communications, by contacting us; and

8.2.1.3 you can change the way your browser or device manages cookies, which may be used to deliver online advertising, by following the settings on your browser as explained in the "Cookies" section (section 11) below.

8.2.2 We recommend you routinely review the privacy policies and preference settings that are available to you on any social media platforms.

8.3 **More about profiling and analytics**

8.3.1 We use some of the information you provide to us in order to perform profiling and analytics with the data.

8.3.2 One of the methods by which we do this is by installing and using Cookies on your browser or device. You can learn more about how to adjust settings relating to Cookies on your browser and device, and about our Cookie Policy in the "Cookies" section (section 11) below.

8.3.3 Some of the legitimate purposes according to which we profile and analyse data include:

8.3.3.1 to allow us to enhance our provision of services to you;

8.3.3.2 to provide you with tailored content online and optimise your experience of our websites;
8.3.3.3 to offer personalised products when you use our services;

8.3.3.4 to obtain a better understanding of our customers, what you would like to see from us, and how we can improve our services for you;

8.3.3.5 to share advertising material we believe may be of interest to you, including from our third party partners; and

8.3.3.6 to help us operate our services more efficiently.

8.3.4 If you are using Expo 2020 Dubai Websites from a location in the EU or a country with similar data protection laws, we will only profile your Personal Data on the basis of our legitimate interests if this does not override your own interests or fundamental rights and freedoms.

9. TRANSFERRING PERSONAL DATA INTERNATIONALLY

9.1 We operate our organisation from the United Arab Emirates ("UAE"), where we have our head office.

9.2 In performing our operations we may need to transfer data, including your Personal Data, to the European Union ("EU") (including the United Kingdom ("UK"), in the event it leaves the EU) and/or the UAE. Our third party service providers may also need to transfer your Personal Data to third countries outside the EU in order to perform their services. By agreeing to the terms of this Privacy Policy, you agree that your Personal Data may be transferred internationally from your location when you use our services or when you agree to this Privacy Policy.

9.3 We will take appropriate steps to ensure that transfers of Personal Data are in accordance with applicable laws and carefully managed to protect your privacy rights and interests. If your Personal Data is being transferred outside the EU then transfers will be limited to countries which are recognized as providing an adequate level of legal protection as assessed by the European Commission or where we can be satisfied that alternative data protection arrangements are in place to protect your privacy rights. To this end, if required by law, where we transfer your Personal Data to third parties who help provide our products and services, we obtain contractual commitments from them to protect your Personal Data.

9.4 You have a right to contact us for more information about the safeguards we have put in place (including, for EU data subjects, the right to receive a copy of relevant contractual commitments we have put in place, which might be redacted) to ensure the adequate protection of your Personal Data when this is transferred as mentioned above. See also the section titled "Your Rights" (section 12), below.

10. HOW WE PROTECT AND STORE YOUR INFORMATION

10.1 How we protect your information
10.1.1 We invest an appropriate level of resources to protect the security and confidentiality of Personal Data and to prevent unauthorised access to that information. In particular:

10.1.1.1 We follow strict security procedures in the storage and disclosure of information which you have given us (including through password protection and, in some cases, encryption);

10.1.1.2 We take all reasonable and appropriate steps to protect your Personal Data but cannot guarantee the security of any data you disclose to us via email or online; and

10.1.1.3 Where you disclose information to us using our mobile app, please ensure that your device remains safe. We cannot be held responsible for any data misuse arising from unauthorised access to your device.

10.2 Storing your Personal Data

10.2.1 We will store your Personal Data for as long as reasonably necessary for the purposes for which it was collected, as explained in this Privacy Policy.

10.2.2 In some circumstances we may need to store your Personal Data for longer periods of time, for instance where we are required to do so in accordance with legal, reporting, regulatory, tax, accounting requirements. Should you require information about how we retain particular information you can contact us.

10.2.3 Where your information is no longer required, we will ensure it is disposed of in a safe manner.

10.2.4 In specific circumstances we may store your Personal Data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings.

11. COOKIES

11.1 Our policy on "cookies"

11.1.1 A cookie is an element of data that a website sends to your browser, which then stores it on your system. Cookies may collect Personal Data about you. Cookies allow us to understand who has seen which pages and advertisements, to determine how frequently particular pages are visited and to determine the most popular areas of our website. Cookies also allow us to make Expo 2020 Dubai Websites more user-friendly by, for example, allowing us to take you to the language site of last use, so that we can give you a better experience when you return to our website.
11.1.2 Cookies will be deployed on your device when you visit Expo 2020 Dubai Websites unless you indicate that you do not wish this to happen or if you have turned this feature ‘off’ in your web browser or device settings.

11.1.3 Only the issuer of the cookie concerned may read or modify the information contained therein.

11.2 Cookies deposited by a third party on Expo 2020 Dubai Websites

11.2.1 Our websites may contain cookies issued by third parties (e.g. communication agency, audience measurement company, targeted advertising provider, etc.) allowing them, during the validity period of their cookies:

11.2.1.1 To collect browsing information about browsers browsing our websites; and

11.2.1.2 To determine the advertising content that may correspond to your interests; and

11.2.1.3 To send you targeted advertising, in view of your browsing history collected by the third party.

11.2.2 At any time, you can prevent the collection of information about you via these third-party cookies, by clicking on the corresponding links (see section 11.3 below).

11.2.3 The issue and use of Cookies by a third party company is subject to the respective company’s own terms of use.

11.3 Your management and use of cookies

11.3.1 You can manage and modify your use of cookies through your browser software.

11.3.2 The settings you make may change your Internet browsing and your conditions of access and use of certain services on Expo 2020 Dubai Websites that require the use of cookies.

12. YOUR RIGHTS - LEGAL RIGHTS AVAILABLE TO HELP MANAGE YOUR PRIVACY

12.1 You may have rights relating to your Personal Data depending upon the country in which you access Expo 2020 Dubai Websites.

12.2 Where you access Expo 2020 Dubai Websites in the EU or the UK (in the event the UK has left the EU at the time of reading), you will have certain rights in relation to our handling of your Personal Data, including the right to:

12.2.1 Access your Personal Data (commonly known as a “data subject access request”). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
12.2.2 Erase your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Please note that for certain purposes we may be legally obligated to retain your data (see section 10).

12.2.3 Restrict the processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data under the following circumstances:

12.2.3.1 if you want us to establish the data’s accuracy;

12.2.3.2 where our use of the data is unlawful;

12.2.3.3 where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or

12.2.3.4 you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

12.2.4 Transfer your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

12.2.5 Object to the processing of Personal Data where our lawful basis for such processing is our legitimate interests (or those of a third party) and where you can specifically justify an objection to such processing on the basis that your fundamental rights and freedoms override our legitimate interests.

12.2.6 Object to how we use your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which may override your rights and freedoms.

12.2.7 Obtain a copy of safeguards used when we transfer your Personal Data outside the jurisdiction in which the Personal Data were captured (as per paragraph 9.4).

12.2.8 Lodge a complaint with your local data supervisory authority.

12.3 Please note that the rights referred to in paragraph 12.2 are not absolute and may be subject to our own rights in respect of the Personal Data.

12.4 While you may have rights to lodge a complaint to a local privacy authority, whether you lodge a complaint and who you lodge it with is solely your responsibility.
12.5 If you wish to exercise any of these rights, we may ask you for additional information to confirm your identity and for security purposes, in particular before disclosing Personal Data to you. We reserve the right to refuse your request, if such request is manifestly unfounded or excessive.

12.6 You can exercise your rights by contacting us. Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

12.7 We may not always be able to address your request fully, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

13. INFORMATION ABOUT YOUR DEPENDENTS AND RELATED PERSONS

13.1 If you provide Expo 2020 Dubai with Personal Data about your next of kin and/or related persons for emergency contact or any other purposes, it is your responsibility to inform such individuals about such activities and to obtain their consent, where necessary, to the processing (including transfer) of their Personal Data as set out in this Privacy Policy.

14. COLLECTION OF DATA FROM MINORS

14.1 If you are resident in the UAE and under 21 or, alternatively, are resident elsewhere and are not yet the relevant age of majority in the jurisdiction in which you reside, we are not permitted to contract with you directly. By agreeing to this Privacy Policy, you acknowledge and agree that your guardian has read and consented to its terms on your behalf. If we seek your consent to process your Personal Data for a specific purpose in accordance with this Privacy Policy, such consent must be granted on your behalf by your guardian.

15. CONTACT US

15.1 If you have any questions, concerns or complaints regarding our compliance with this Privacy Policy and the data protection regulations, or if you wish to exercise your rights, please contact us. We will investigate and will attempt to resolve complaints and disputes and make every reasonable effort to honour your wish to exercise your rights as quickly as possible, in any event, within the timescales provided by applicable data protection laws.

15.2 In some countries, you may have a right to lodge a complaint with your local data protection supervisory authority. We ask that you please attempt to resolve any issues with us before referring to your local supervisory authority.