



HOULIHAN LOKEY

Houlihan Lokey

DIFC – Privacy Notice

August 2022

Privacy Notice

In this notice, “we”, “us” and “our” means Houlihan Lokey (MEA Financial Advisory) Limited (“**Houlihan Lokey MEA**”) established in the Dubai International Financial Centre (“EEA”), (any such affiliate, “**Houlihan Lokey**”).

About this privacy notice

For the purposes of the DIFC Data Protection Law No. 5 of 2020 (the “**DIFC DPL**”) we are a Controller in respect of your personal data. We are responsible for ensuring that we use your personal data in compliance with data protection law.

The privacy notice sets out the basis on which any personal data about you will be processed by us. Please take the time to read and understand this privacy notice.

Personal data that we collect about you

We will collect and process the following personal data about you:

- **Information that you provide to us or one of our affiliates.** This includes information about you that you give to us by filling in forms or by communicating with us, whether face-to-face, by phone, e-mail, instant messaging, or otherwise through the provision of products and services to you by us. This information may include: your full name, date of birth, gender, nationality, education and qualification details, marital status, details of spouse, home address and home telephone number, mobile telephone number, personal and work related emails, next of kin and details about your dependents, emergency contact details, bank account details, tax details, national insurance number and information about your current or past earnings, income and other details pertaining to your personal finances.
- **Information we collect or generate about you.** This includes: personal data that we collect through your use of our email system (including but not limited to your full name, email address and the content, date and time of your email correspondence); work-related details such as job position, contact details, performance at work, absences, pay and benefits information, service history, a copy of your employment agreement, passport details, photograph, health information, pregnancy and/or disability status; biometric data (including passport photographs and fingerprints) collected for residence permits, laptop authentication processes and restricting access to Houlihan Lokey premises; security-related data obtained through our CCTV systems deployed in the Houlihan Lokey premises and records of time entry and exit into and out of the Houlihan Lokey premises.
- **Information we obtain from other sources.** We may have certain legal and regulatory responsibilities to verify the identity of clients/customers and may need to make certain inquiries and obtain certain information from you for that purpose, this includes background screening, criminal records and credit checks and other KYC related information.

Uses of your personal data

Your personal data may be stored and processed by us in the following ways and for the following purposes:

- to fulfill your requests for information, products, or services exercise our rights and fulfill our obligations under any contract for products or service which you enter with us;
- to meet our legal and regulatory obligations as a regulated firm;
- to communicate with you; and
- to effectively and efficiently manage the operation of our business and provide our services to clients.

We may also use your personal data for marketing our own and selected third parties’ products and services to you by post, email, SMS, phone, or through other means, and we may use your Personal data to send you newsletters, announcements, and invitations that we think you may be interested in.

We provide the option to unsubscribe or opt out of further communication on any electronic marketing communication sent to you, which you can exercise by following the unsubscribe instructions provided in the email you receive or by contacting us directly at Webmaster@HL.com.

Please note that, despite your indicated email preferences, we may send you service-related communications, including notices related to our [Terms of Use](#), [Cookies Policy](#), or [Privacy Policy](#).

However we use Personal data, we make sure that the usage complies with the law, and the law allows us and requires us to use Personal data for a variety of reasons. These include:

- where we have obtained your consent;
- to perform our contractual obligations with you;
- where we have legal and regulatory obligations that we have to discharge;
- to establish, exercise, or defend our legal rights or for the purpose of legal proceedings;
- where the use of personal data, as described, is necessary for our legitimate business interests, such as:
 - allowing us to effectively and efficiently manage and administer the operation of our business; and
 - maintaining compliance with internal policies and procedures.

Security and Export of Personal data

We have implemented certain measures reasonably designed to secure your personal data from accidental loss and from unauthorized access, use, alteration, and disclosure. Despite the measures we take to protect your personal data from unauthorized access or disclosure, the internet is an inherently unsecure environment; therefore, we cannot guarantee the security or confidentiality of your personal data. We make no warranty whatsoever to you, express or implied, regarding the security of the WhatsApp platform. Any transmission of personal data is at your own risk. We assume no liability for any disclosure of data due to, among other things, errors in transmission, unauthorized third-party access or other acts of third parties, or acts or omissions beyond our reasonable control.

Disclosure of Personal data

We may disclose personal data we have collected from or about you to such persons or organizations who may use your personal data for the purposes set out in this Privacy Notice, including

- any of our affiliated entities (including entities outside your country as described under the heading “International Transfers of Information” below);
- contractors, service providers, and other third parties we use to support our business, including companies that perform marketing services on our behalf;
- buyer(s) or other successor(s) in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets (including during negotiations of the foregoing to prospective buyer(s)), whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding;
- any purpose disclosed by us when you provide the information; or
- with your consent.

We may also disclose personal data:

- if we reasonably believe we are required or authorized by law, law enforcement agencies, the court service and/or regulators, the government, or private parties in connection with a lawsuit, subpoena, investigation, or similar proceeding anywhere in the world, or to otherwise cooperate with law enforcement or regulatory authorities or comply with our reporting, legal, or regulatory requirements;
- to enforce or apply the provisions of any contract for products or services you may have with us;
- if we believe disclosure is necessary or appropriate in connection with the rights, property, or safety of any party;
- to establish, exercise, or defend our rights or property or those of any of our affiliated entities or users of the Website; or
- to investigate or assist in preventing any violation or potential violation of applicable laws or regulations, this Privacy Notice or any contract for products or services you may have with us.

International transfers of personal data:

Your personal data may be transferred to and stored in databases hosted and maintained outside of DIFC. It may be stored and processed by other Houlihan Lokey group companies and/or third parties in other countries, which may include destinations outside of the DIFC.

Where your personal data is transferred outside the DIFC, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the DIFC. This can be done in a number of different ways, for instance:

- the DIFC Commissioner of Data Protection (the “**Commissioner**”) has determined that the jurisdiction to which we send your personal data provides provide an adequate level of protection for your personal data; or
- we have in place appropriate safeguards which may include “binding corporate rules” or “standard data protection clauses” approved by the Commissioner which protect your personal data and provide appropriate data subject rights and legal remedies in accordance with the DIFC DPL.

In all cases, however, we will ensure that any transfer of your personal data is compliant with all applicable data protection law, including the DIFC DPL.

You can obtain more details about the protection given to your personal data when it is transferred outside the DIFC by contacting us in accordance with the “Contacting Details” section.

Your Rights

You have certain rights under the DIFC DPL to access or update your personal data held by us and to object, where legitimate, to the processing of data relating to you. These rights include:

- the right to obtain information regarding the processing of your personal data and access to the personal data we hold about you;
- the right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so;
- in some circumstances, the right to receive some personal data in a structured, commonly used, and machine-readable format and/or to request that we transmit those data to a third party where this is technically feasible (please note that this right only applies to personal data that you have provided to us);
- the right to request that we rectify your personal data if it is inaccurate or incomplete;
- the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your Personal data but we are legally entitled to retain it;
- the right to request that we restrict our processing of your Personal data in certain circumstances (again, there may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled to refuse that request);
- object to any decision based solely on automated processing, including profiling; and/or
- the right to lodge a complaint with the relevant data protection regulator if you think that any of your rights have been infringed by us.

You may contact us as described below to exercise your rights. Exercising certain rights may be subject to a fee as provided by law or otherwise to meet our costs in providing you with details of the Personal data we hold about you, and there may be certain categories of information we are entitled not to provide.

In order to ensure that your Personal data remains accurate, please notify us of any changes to the Personal data that you have provided using the contact details provided under the heading “Contacting Us” below.

Retention of personal data

How long we hold your personal data for will vary. The retention period will be determined by the following criteria:

- the purpose for which we are using your personal data – we will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

Contacting us

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please contact us at the following email address: DPO-EU@hl.com