

# TPG U.A.E. (DIFC AND ADGM) – VENDOR AND SERVICE PROVIDER REPRESENTATIVE PRIVACY NOTICE

Last modified: *May 2024*

This Privacy Notice (“Notice”) describes how TPG Capital – U.A.E. LLC and TPG (A) Limited (together, “TPG”, “we” or “us”) collects and uses the personal data of representatives of our vendors and service providers (“Vendor Representatives”) in the Dubai International Financial Centre (“DIFC”) and the Abu Dhabi Global Market (“ADGM”). The TPG entity that collects Vendor Representative Personal Data is the data controller in respect of Vendor Representative Personal Data and is either TPG Capital – U.A.E. LLC (for individuals in DIFC) or TPG (A) Limited (for individuals in ADGM).

## Personal Data We Collect About You

In connection with our relationships with our vendors, we collect and use limited personal data about Vendor Representatives from time to time. This personal data may include a Vendor Representative’s name, contact details (address, email address, and phone number), government-issued identification number, bank account information, and photographs, as well as the contents of any electronic communications with TPG including but not limited to Bloomberg Messaging, Zoom, WhatsApp, WeChat, and any other messaging platform.

We do not collect your sensitive personal data unless we are required or permitted to do so by applicable law or regulations, or you have, in accordance with applicable law, provided your explicit consent to the collection and processing of your sensitive personal data.

## How We Use Your Personal Data

We use the personal data that we collect about Vendor Representatives to facilitate our relationship and communication with the vendors, and to retain a record of our communications with the vendors. We also use the personal data that we collect about Vendor Representatives in connection with performance of background checks and carrying out due diligence and payment risk assessments in relation to the vendors. We may also use the photographs of Vendor Representatives for security purposes if we need to grant Vendor Representatives access to any of our properties. We process personal data for these purposes on the basis that it is necessary for our legitimate interests in managing and assessing the risks relating to our vendors and service providers and in managing the security of our IT systems and premises.

## Data Sharing

We may share personal data about Vendor Representatives with TPG Global LLC and its affiliates for the purposes described in this Notice and subject to the “Data Transfers” section below.

We may share personal data with service providers that perform services on our behalf such as payment service providers, analytics providers, business communications archiving providers, and hosting providers. In accordance with applicable law, we enter into legally binding agreements with our service providers requiring them to use or disclose personal data only as necessary to perform services on our behalf or comply with applicable legal requirements.

In addition, we may disclose personal data about you (a) if we are required or permitted to do so by law or legal process, for example due to a court order or a request from a law enforcement agency, (b) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, (c) in connection with an investigation of suspected or actual fraudulent or other illegal activity, or (d) in connection with (i) the making, management, or disposition of any of our investments or (ii) business continuity.

## Data Transfers

We may transfer the personal data that we collect about you to recipients outside the DIFC and ADGM. Those countries may not have the same data protection laws as the DIFC and ADGM. When we transfer your personal data to recipients in other countries (such as the U.S.), we will protect that personal data in a way that is consistent with this Notice.

We will comply with applicable legal requirements providing adequate protection for the transfer of personal data to recipients in countries outside the DIFC and ADGM. In all such cases, we will only transfer your personal data if:

- The country to which the personal data will be transferred has been granted an adequacy decision under DIFC and ADGM law; or
- We have put in place appropriate safeguards in respect of the transfer, for example the EU Standard Contractual

Clauses or the DIFC Standard Contractual Clauses and the ADGM Addendum to the EU Standard Contractual Clauses.

You may request a copy of the safeguards that we have put in place in respect of transfers of personal data by contacting us as described in the “How to Contact Us” section below.

### **Data Security**

We maintain appropriate technical and organisational measures designed to protect your personal data against loss or accidental, unlawful or unauthorised, alteration, access, disclosure, or use.

### **Data Retention**

Your personal data is retained for the period reasonably necessary to achieve the purposes outlined in this Notice, unless a longer retention period is required or permitted by applicable law, taking into account relevant statutes of limitations and TPG’s records retention requirements.

### **Your Rights and Choices**

Subject to applicable law, you may have the right, in certain circumstances, to request:

- confirmation of whether we process personal data relating to you and, if so, to request a copy of that personal data;
- that we rectify or update your personal data that is inaccurate, incomplete, or outdated;
- that we erase your personal data in certain circumstances, such as where we collected personal data on the basis of your consent and you withdraw that consent;
- that we restrict the use of your personal data in certain circumstances, such as while we consider another request that you have submitted, for example a request that we update your personal data;
- withdrawal of your consent where you have given us consent to process your personal data; and
- that we provide you with a copy of your personal data which you have provided to us in a structured, commonly used, and machine readable format, and/or that we transmit that data to a third party (where this is technically feasible).

If you wish to exercise any of your data protection rights or if you consider that we have processed your personal data in violation of applicable law, please contact us as detailed in the “How to Contact Us” section below.

If you consider that we have processed your personal data in violation of applicable law and failed to remedy such violation to your reasonable satisfaction, you may also lodge a complaint with the DIFC Commissioner of Data Protection, or the ADGM Office of Data Protection, as applicable.

### **Updates to this Notice**

We may change or update portions of this Notice at any time without notice to you. Please check our website, [www.tpg.com](http://www.tpg.com), from time to time so you are aware of any changes or updates to this Notice. The revision date appearing on the first page of this Notice underneath the title will identify the date of the last update or revision.

### **How to Contact Us**

If you have any questions about this Notice, or you would like to exercise any of your rights, please let us know by contacting us using by email at [Privacy@tpg.com](mailto:Privacy@tpg.com).