

General



Owner: Global General Counsel I Author: Global General Counsel I Approved: 30.10.2025 I Version: 1.0 I Classification: Public

Addendum to the Privacy Policy (notice to persons in the Kingdom of Saudi Arabia)

This Notice is provided and applies solely to persons who reside in the Kingdom of Saudi Arabia (the "KSA" or the "Kingdom") in accordance with KSA Personal Data Protection Law implemented by Royal Decree No. M/19 of 09/02/1443H (16 September 2021) and amended by Royal Decree No. M/147 of 05/09/1444H (27 March 2023) (the "PDPL"), the Implementing Regulations of the PDPL ("Implementing Regulations"), along with the amendments to the Data Transfer Regulations issued on September 1, 2024 ("Data Transfer Regulations"). This Notice should be read in conjunction with our Privacy Policy.

Terms which are undefined shall have the meanings ascribed to them in the PDPL or the Privacy Policy. Where there is a conflict between the Privacy Policy and this Notice, the terms of this Notice shall apply solely with regards to visitors or users of the website, and others, who reside in the Kingdom.

Information we collect

Control Risks may collect personal data directly from you in the circumstances set out in the Privacy Policy.

In certain circumstances, Control Risks may also collect personal data indirectly from you or via third parties. These circumstances may include:

- Where you have provided your consent;
- Where the personal data is publicly available or collected from public sources;
- Where collection is in your vital interest;
- Where necessary to protect public health, public safety, or to protect life and health of specific individuals;
- Where it is not possible to directly or indirectly identify you from the processing; or
- Where necessary to achieve our legitimate interests provided that this is without prejudice to your rights and interests and there is no sensitive data processed.

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General Disclaimer: The information in this Data Protection Narrative is for general information purposes only and is subject to change without notice; it is not intended and does not constitute legal or other professional advice.

This Data Protection Narrative is provided "as is". All warranties, whether express or implied, are excluded to the maximum extent permitted by applicable laws. Control Risks shall not be liable in relation to this Data Protection Narrative and it shall not be responsible for any loss, damage or cost resulting from any decisions taken by any person that is made in reliance on this Data Protection Narrative, including legal, compliance and/or risk management decisions.



You are not required to provide personal data to us; however, we may be unable to provide you with services in the event you decline to provide us with your personal data or otherwise restrict processing.

Use of Data

As described in the Privacy Policy, we may share your personal with other members of the Control Risks Group and third-party service providers. We may also share your personal data with competent authorities in the Kingdom.

We do not sell your personal data. We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

We may transfer your personal data outside of the Kingdom as set out in our Privacy Policy. The information you submit may be transferred, stored and hosted outside of the Kingdom, in which case we will implement appropriate measures to ensure that transfers of your personal data are done in a manner that is compliant with the PDPL, its Implementing Regulations, and the Data Transfer Regulations, your personal data remains protected and secure when it is transferred outside the Kingdom and you may exercise your rights effectively.

If you would like further details of how your personal data is protected when transferred from one country to another, then please email legal@controlrisks.com.

Data Subject's Rights

Under the PDPL, visitors or users of the website, and others, who reside in the Kingdom may have certain rights regarding their Personal Data, which differ from or are supplemental to those listed in the Privacy Policy, including:

- The right to request access to your personal data if it is available to Control Risks;
- The right to request the deletion of your personal data where it is no longer necessary for the purpose(s) for which it was originally collected, unless Control Risks is required to retain the personal data for a particular period of time to comply with a legal obligation or if the personal data relates to a case under consideration by a judicial authority (in which case the personal data will be deleted after the period of time has lapsed or the judicial procedure is concluded);
- The right to request that Control Risks amends or updates your personal data where it is inaccurate
 or incomplete, subject to any supporting documents or evidence which may be required to verify
 such request;
- The right to be informed about how and why Control Risks processes your personal data;
- The right to request a copy of your personal data in a format that is readable and clear;
- The right to withdraw consent at any time (where Control Risks asked for your consent to use your information for that particular purpose); and
- Any other rights granted by applicable laws.

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You can exercise any of the above rights by contacting us as provided in the Contact section of this Notice below.

Please note that these rights are not absolute and in certain circumstances we may deny your request. We will notify you of the reasons of such denial in writing.

Complaints

If you are not satisfied with our use of your personal data in respect of this website or our response to any request by you to exercise your rights, or if you think that we have breached any relevant data protection laws, then please email legal@controlrisks.com.

You may in addition have the right to complain to the Saudi Data & Artificial Intelligence Authority or any other competent authority in the Kingdom that is designated with the power to receive such complaints from time to time. For more information, please visit SDAIA's websites:

- Saudi Data & Al Authority (sdaia.gov.sa)
- National Data Governance Platform "DGP" (dgp.sdaia.gov.sa)

More information

This Addendum is subject to changes, amendments, or may be supplemented from time to time. New versions will be published on our website and will be effective immediately upon publication. Changes may also be communicated via email. Please check this page occasionally to see any updates or changes.

For any questions regarding this Addendum, please contact us using the details below.

Contact

While any member of the Control Risks Group may process your personal data as controller, the primary controller responsible for personal data in KSA will be Company Maqaru Control Risks Al-Iqlimiu. You may contact us here:

Company Maqaru Control Risks Al-Iqlimiu
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Kingdom of Saudi Arabia

Tel: +966 500 1040 81

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