

Events Dubai Privacy Notice

Last Updated October 1, 2020

This **Privacy Notice** explains how BANK OF AMERICA CORPORATION branches, affiliates and subsidiaries established in Dubai, including BANK OF AMERICA MERRILL LYNCH INTERNATIONAL – DUBAI INTERNATIONAL FINANCIAL CENTER (“DIFC”) BRANCH (each a “**BofA Dubai Entity**” or “**we**”), collect, use and disclose personal data online and offline in connection with registrants for events (“**Events**”) that we host. We refer to the individuals whose Personal Data (as defined below) we process, such as individuals who register for events or are otherwise engaged by, or interact with clients, their affiliates, event participants, or other third parties in connection with the Events, as “**you**” in this Privacy Notice.

This Privacy Notice is in addition to other privacy notices related to other services BofA Dubai entities provide to clients and individuals.

PERSONAL DATA

“**Personal Data**” is information that identifies an individual or relates to an identifiable individual, which may be collected in relation to Events that we host, including one or more of the following:

- Name
- Account details and related contact information
- Postal address
- Telephone or fax number
- Email address and other identifying addresses for electronic communications
- Date of birth
- Signature
- Details from passports and other government or state issued forms of personal identification (including social security, driver’s license, national insurance and other identifying numbers)
- Telephonic or electronic recordings
- Speaker biographies
- Photographic or video images
- Travel details
- Name and age of child/children

We need to collect and process Personal Data in order to host Events, or because we are legally required to do so. If we do not receive the information that we request, we may not be able to deliver a positive experience during our hosted Events. We do not collect the entire set Personal Data listed above for each Event; it varies on the nature of the business.

Collection of Personal Data

You provide Personal Data through an Event registration process for events that we host. We also receive Personal Data from your client-coverage groups. We and our agents, affiliates and service providers collect Personal Data in a variety of ways, including:

- **Through the Event:** We may collect Personal Data through planning, hosting, and completing Events.
- **From Other Sources:** We may receive Personal Data from other sources, such as public databases, employers, the entity we provide the Events to and from other third parties.

Keeping Personal Data secure is one of our most important responsibilities. We maintain physical, technical, electronic, procedural and organisational safeguards and security measures to protect personal data against accidental, unlawful, or unauthorised destruction, loss, alteration, disclosure, or access, whether it is processed by us in the EU or elsewhere. Appropriate employees are authorised to access personal data for legitimate and specified business purposes. Our employees are bound by a code of ethics and other internal policies that require confidential treatment of personal data and are subject to disciplinary action if they fail to follow such requirements.

Use of Personal Data

We and our service providers use Personal Data to ensure that all participants in an event have a safe and enjoyable experience. Personal Data may be used, for example, to provide notifications concerning the Event, to answer frequently asked questions, to ensure you have Event materials and up to date information relating to that Event. We use Personal Data to comply with our legal obligations. We have a legitimate business interest in using Personal Data to manage the Event and ensure a safe Event for all, including the following:

- Data analysis, for example, to improve our Events and develop new Events;
- Audits carried out by our team, to verify that our internal processes function as intended and are compliant with legal, regulatory or contractual requirements;
- Enhancing, improving, or modifying our current products and services;
- Determining the effectiveness of our Events, so that we can adapt our Events to the needs and interests of our clients and participants; and
- Developing and delivering Event-related activities, for example, understanding which parts of our Events are of most interest to our users so we can focus our energies on meeting our users' interests.
- Responding to enquiries and fulfil requests from our Event participants and/or relevant third parties who require information as a necessary part of Event participation, and to manage our relationships;
- Verifying an individual's identity in order to allow access to Events;
- Protecting the security of Personal Data;
- Developing and improving Event-related content and programming;
- Providing, and performing our obligations with respect to, the Events or otherwise in connection with the Events; and,
- Sending administrative information to Event participants.

Please note that Personal Data we collect in order to meet our legal and regulatory obligations related to the prevention of money laundering and terrorist financing is processed only for those purposes, unless otherwise permitted or agreed.

Disclosure of Personal Data

Personal Data may be disclosed to third parties in connection with the Events we are hosting. The recipients of any such information will depend on the Events that are being hosted. Subject to any restrictions around confidentiality we have expressly agreed with our Event participants, such disclosures may include disclosures:

- to affiliates and subsidiaries of BofA Dubai Entities for the purposes described in this Privacy Notice (“affiliates”); and,
- To Event vendors, organizers, volunteers, contractors, and sponsors to facilitate the event.

Disclosures of Personal Data which we make to our third party service providers, as described in this section, will be made subject to conditions of confidentiality and security as we may consider appropriate to the specific circumstances of each such disclosure.

Other Uses and Disclosures

We may also use and disclose Personal Data as we believe to be necessary or appropriate:

- to comply with applicable law including treaties or agreements with or between foreign or domestic governments (including in relation to tax reporting laws); and,
- To enforce our terms and conditions and protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.

OTHER INFORMATION

“Other Information” is any information that does not reveal a person’s specific identity or does not directly relate to an identifiable individual, such as:

- Browser and device information
- App usage data
- Information collected through cookies, pixel tags and other technologies
- Demographic information and other information provided by you that does not reveal a person’s specific identity
- Information that has been aggregated in a manner that it no longer reveals a person’s specific identity
- Survey responses and similar information which reveals views and preferences, but which does not reveal a person’s specific identity.

If we are required to treat Other Information as Personal Data under applicable law, then we may use and disclose it for the purposes for which we use and disclose Personal Data as detailed in this Privacy Notice. Where "Other information" are Personal Data, we process it in accordance to rules for data protection and as detailed in this Privacy Notice.

Collection of Other Information

We and our service providers may collect Other Information in a variety of ways, including:

- **Through a browser or device:** Certain information is collected by most browsers or automatically through devices, such as a Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Services (such as the App) being used. We use this information to ensure that Event-related services function properly.
- **Using cookies:** Cookies are pieces of information stored directly on the computer being used. Cookies allow us to collect information such as browser type, time spent on the Events, pages visited, language preferences, and other anonymous traffic data. We and our service providers use the information for security purposes, to facilitate navigation, to display information more effectively, and to personalize the user's experience. We also gather statistical information about use of the Services in order to continually improve their design and functionality, understand how they are used and assist us with resolving questions regarding them. We do not currently respond to browser do-not-track signals.

Most browsers allow individuals to automatically decline cookies or be given the choice of declining or accepting a particular cookie (or cookies) from a particular website. Please refer to <http://www.allaboutcookies.org/manage-cookies/index.html> for more information. Declining cookies may cause certain parts of the Event-related services to cease working.

- **Using pixel tags and other similar technologies:** Pixel tags (also known as web beacons and clear GIFs) may be used to, among other things, track the actions of users of the Event-related services (including email recipients), measure the success of our marketing campaigns and compile statistics about usage of the Event-related services and response rates.
- **Analytics:** We may use Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Services and report on activities and trends. This service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's practices by going to www.google.com/policies/privacy/partners. We may use Flash LSOs and other technologies to, among other things, collect and store information about your use of the Services. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the Website Storage Settings Panel, which can be found by going to http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html. You can also go to the Global Storage Settings Panel at http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager03.html and follow the instructions (which may explain, for example, how to delete existing Flash LSOs (referred to as "information"), how to prevent Flash LSOs from being placed on your computer without your being asked, and how to block Flash LSOs that are not being delivered by the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications.
- **IP Address:** An IP address is automatically assigned to a computer by an Internet Service Provider. An IP address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the page(s) that were visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering the Services. We may also derive approximate location from IP address.

Uses and Disclosures of Other Information

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. In some instances, we may combine Other Information with Personal Data. If we do, we will treat the combined information as Personal Data as long as it is combined.

THIRD PARTY SERVICES

This Privacy Notice does not address, and we are not responsible for, the privacy information or other practices of any third parties, including any third party operating any website or service to which the Services link. The inclusion of a link related to Events does not imply endorsement of the linked site or service by us or by our affiliates.

SECURITY

We seek to use reasonable organizational, technical and administrative measures to protect Personal Data within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the "Contacting Us" section below.

CHOICES AND ACCESS

Receiving electronic communications from us

Personal Data collected, received or generated for and during the Events we host is not used in marketing-related email campaigns from us. We may still send you important administrative and Event-related messages, which you cannot opt out of.

INDIVIDUAL RIGHTS

You may be entitled to make certain requests of BofA Dubai entities under applicable data protection law. These rights may include, subject to applicable conditions or restrictions:

- The right of confirmation of the existence of processing;
- The right of access the data;
- The right to request correction of incomplete, inaccurate, or out-of-date data;
- The right to request deletion
 - deletion, anonymization, or blocking of unnecessary or excessive data, or data processed in noncompliance with the law
 - deletion of personal data processed with the consent of the data subject;
- The right of request portability to another provider by means of an express request, "pursuant to the regulation of the controlling agency";
- The right to request information about public and private entities with which the controller has shared data; and
- The right to revoke consent.

How individuals can access, change or suppress their Personal Data

You may have certain rights under local data protection laws, including (but not limited to): the right to request access to your personal data or the right to object to, withdraw consent to, restrict, or request discontinuance of collection, use, disclosure, and other processing of your personal data as described in this Notice. If you would like to request to review, correct, update, suppress, restrict or delete Personal Data that you have previously provided to us, or if you would like to request to receive an electronic copy of your Personal Data for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact us by emailing individualrightsrequests@bofa.com. We will respond to your request consistent with applicable law.

In your request, please make clear what Personal Data you would like to have changed, whether you would like to have the Personal Data suppressed from our database or otherwise let us know what limitations you would like to put on our use of the Personal Data. For your protection, we may only implement requests with respect to the Personal Data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable and in adherence to applicable deadlines.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

RETENTION PERIOD

We will retain Personal Data for as long as needed in accordance with our retention schedules or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you and deliver the Events; (ii) whether there is a legal obligation to which we are subject; and (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

AUTOMATED DECISION MAKING

We do not use automated decision making in our processes.

PARTICIPATION IN EVENTS BY MINORS

Our Events are not directed to individuals under the age of eighteen (18), and we do not knowingly collect Personal Data from individuals under 18. Information about children attending an Event is submitted by the parent(s), or legal representative of an individuals under 18, when participating in family-oriented Events.

JURISDICTION AND CROSS-BORDER TRANSFER

Personal Data may be stored and processed in any country where we have facilities or in which we engage service providers, including the United States. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access Personal Data.

For transfers from Dubai to countries not considered adequate, we have put in place adequate measures, such as standard contractual clauses to protect Personal Data. Transfers may also be made pursuant to contracts in your interest or at your request.

By providing BofA Dubai Entities with your Personal Data, you recognize and understand that BofA Dubai Entities may collect, use, transfer, or disclose your Personal Data to the third parties and for the purposes identified in this Notice to reasonably provide you the desired Events experience. If you do not provide us with the Personal Data described in this Notice, BofA Dubai Entities may no longer be able to provide you the desired Event experience. In the event that BofA Dubai Entities seeks to disclose your information to promote or publicize Events, BofA Dubai Entities will obtain specific consent for such marketing purpose prior to such disclosure. Your consent for such marketing purposes is not a condition of participating in the Events.

SENSITIVE PERSONAL INFORMATION

We do not typically collect sensitive Personal Data in connection with the Events. Please do not send us any Personal Data which would be categorized as sensitive personal data as defined in LGPD (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics or trade union membership) (“**Sensitive Data**”) through the Events or otherwise, unless we specifically request this information from you or make a due diligence enquiry of you where the response necessitates you disclosing Sensitive Data to us.

At the time of Events registration, participants may be asked to attest to health-related symptom(s) that confirm the lack of any of the symptoms outlined in the attestation prior to being permitted entry to an Event. Additionally, participants may tell us about individual circumstances that may require accommodation(s) (e.g. disabilities). Such attestation or accommodation information will be used only to the extent necessary to facilitate any accommodations and help promote the safety and public health of participants during the Event. In such case, please ensure you notify us that you are providing Sensitive Personal Data.

Photographic or video images may be collected during specific Events, and are limited to Event speakers or panelists. We may receive Sensitive Personal Data from third party service providers and others in support of due diligence activities we undertake to satisfy various legal and regulatory requirements to which we are subject.

UPDATES TO THIS PRIVACY NOTICE

We may change this Privacy Notice, from time to time. The “LAST UPDATED” legend at the top of this Privacy Notice indicates when this Privacy Notice was last revised. Any changes will become effective when we post the revised Privacy Notice. Continued use of the registration website following these changes (or your continued provision of Personal Data to us) signifies your reading of the revised Privacy Notice.

CONTACTING US

The BofA Dubai Entities who provides the Events in connection with which your Personal Data has been provided is the company responsible for collection, use and disclosure of your Personal Data under this Privacy Notice.

If you have any questions about this Privacy Notice, please contact your Client Relationship Manager if applicable. Otherwise, you may also contact our DIFC Data Protection Officer at BOFA.DIFCDPO@BOFA.com.

To help us to manage your query, please include your full name and the name of the BofA Dubai Entity you understand is processing your personal data and/or any reference number that was made available by a BofA Dubai Entity to you.