ORIENT TAKAFUL PJSC

Privacy Notice & Data Protection Policy

Medical Insurance Online Portal

Document Reference	LDPP-001 v1.3
Effective Date	1 st April 2026
Last Reviewed	24th September 2026
Data Controller	Orient Takaful PJSC, P.O. Box 183368, Dubai, UAE
Regulatory Basis	UAE PDPL (FDL No. 45/2021) | ADHICS | ISO 27001:2022 | UAE Cyber Law No. 2/2012
DPO Contact	otkfl.dataprivacy@orienttakaful.ae | +971 4 601 7500
Applies To	All users of the Orient Takaful Medical Insurance Online Portal
Classification	Public – For publication on orienttakaful.ae
Review Cycle	Annual or upon material change in applicable law

1. Who We Are

Orient Takaful PJSC ("Orient Takaful", "we", "us", or "our") is a licensed insurance company registered and operating in the United Arab Emirates under Federal Law No. (6) of 2007, Certificate No. 14 dated 29 December 1984, issued by the Insurance Authority of the UAE.

We operate the Orient Takaful online portal (orienttakaful.ae), including the Medical Insurance Transaction Portal ("the Portal"), through which individuals may obtain medical insurance quotations, purchase policies, manage their coverage, and submit related enquiries.

Orient Takaful acts as the Data Controller for all personal data collected through the Portal and is responsible for ensuring that your data is handled in accordance with the UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data ("UAE PDPL"), the Abu Dhabi Healthcare Information and Cyber Security Standard ("ADHICS"), and all other applicable UAE laws.

> **Contact Our Data Protection Officer (DPO)**
> For all data protection enquiries, subject access requests, or complaints: otkfl.dataprivacy@orienttakaful.ae | Tel: +971 4 601 7500 | P.O. Box 183368, Dubai, UAE. You may also write to us at the registered address above.

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2. Scope & Application

This Privacy Notice applies to:

- All individuals who access or transact through the Orient Takaful Medical Insurance Online Portal;
- All personal data submitted via quotation requests, policy applications, payment transactions, and account registrations on the Portal;
- Communications sent to us electronically through the Portal, by email, or by telephone in relation to Portal services;
- All cookies and digital tracking technologies deployed on the Portal.

This Notice does not apply to third-party websites, services, or portals that may be accessible via links from our Portal. Orient Takaful is not responsible for the privacy practices of third parties.

3. Legal & Regulatory Framework

Orient Takaful processes personal data in full compliance with the following applicable laws and regulatory standards:

Regulatory Instrument	Applicability
UAE PDPL — Federal Decree-Law No. 45/2021	Primary legislation governing the collection, processing, storage, transfer, and protection of personal data of individuals in the UAE.
ADHICS v2 (Abu Dhabi Healthcare Information & Cyber Security Standard)	Mandatory standard for health data security and privacy, applicable to medical information processed in connection with UAE healthcare services, including insurance.
UAE Cyber Law — Federal Decree-Law No. 34/2021 (& No. 2/2012)	Governs cybercrime, unauthorised data access, electronic fraud, and digital privacy violations.
UAE Insurance Authority Regulations & CBUAE Circulars	Sector-specific data handling obligations for licensed UAE insurance operators.
Federal Law No. 6 of 2007 (UAE Insurance Law)	Regulatory framework for insurance operations including policyholder data obligations.
ISO/IEC 27001:2022	International standard for information security management systems applied to Orient Takaful's data infrastructure.

4. Personal Data We Collect

When you use the Orient Takaful Medical Insurance Portal, we may collect the following categories of personal data. You are not obliged to provide your personal data, but failure to provide certain information may prevent us from providing you with the requested insurance product or service.

4.1 Identity & Contact Data

- Full legal name, date of birth, gender, and nationality;
- Emirates ID number and passport details (required for policy issuance);
- Email address, UAE mobile number, and residential address;
- Employer name and occupation (where required for group medical underwriting).

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4.2 Health & Medical Data (Sensitive Personal Data under UAE PDPL)

Sensitive Personal Data — Heightened Legal Protection

Health and medical data constitute Sensitive Personal Data under Article 1 of the UAE PDPL and is subject to additional legal protection under ADHICS. Orient Takaful processes this data only where a lawful basis exists, including your explicit written consent or where processing is strictly necessary for the provision of medical insurance services.

- Medical history and pre-existing conditions declared during the policy application;
- Health declarations, fitness-to-insure statements, and medical questionnaire responses;
- Claims data including diagnoses, treatments, prescriptions, and medical provider information;
- Laboratory results, radiology reports, or specialist referrals where submitted in support of a claim.

4.3 Financial & Payment Data

- Payment card details processed securely through our PCI-DSS compliant payment gateway (Orient Takaful does not store full card numbers);
- Bank account information for premium refunds or policy adjustments;
- Transaction identifiers, payment status records, and premium payment history.

4.4 Technical & Usage Data

- IP address, browser type and version, operating system, and device identifiers;
- Pages visited, session duration, navigation path, and Portal usage patterns;
- Cookie identifiers and analytics data — see Section 10 (Cookies) for full details;
- Login credentials (passwords are stored in hashed form only and are never accessible to Orient Takaful staff).

4.5 Communications Data

- Records of enquiries, complaints, or correspondence submitted through the Portal;
- Telephone call records where calls are recorded for quality and compliance purposes (you will be informed at the start of any recorded call).

5. How We Use Your Personal Data

We process your personal data only for specified, explicit, and legitimate purposes as required by Article 4 of the UAE PDPL. The table below sets out each purpose and the corresponding legal basis:

Purpose of Processing	Data Categories Used	Legal Basis (UAE PDPL)
To process your medical insurance quotation and policy application	Identity, Contact, Health, Financial	Performance of a contract / Pre-contractual steps
To underwrite and assess insurance risk	Identity, Health, Financial	Legitimate interests / Legal obligation
To administer your policy and process renewals	Identity, Contact, Financial	Performance of a contract

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Purpose of Processing	Data Categories Used	Legal Basis (UAE PDPL)
To process and investigate insurance claims	Identity, Health, Financial, Communications	Performance of a contract / Legal obligation
To process premium payments securely	Identity, Financial	Performance of a contract
To verify your identity and prevent fraud	Identity, Technical	Legal obligation / Legitimate interests
To comply with UAE Insurance Authority and CBUAE reporting obligations	Identity, Financial, Health	Legal obligation
To communicate policy updates, renewals, or material changes	Identity, Contact	Performance of a contract / Legitimate interests
To send marketing communications about Orient Takaful products (with opt-out)	Identity, Contact	Consent (withdrawable at any time)
To improve Portal functionality and user experience	Technical, Usage	Legitimate interests
To respond to regulatory enquiries, audits, or legal proceedings	All categories (as relevant)	Legal obligation / Legitimate interests

6. Sharing & Disclosure of Your Personal Data

Orient Takaful does not sell, rent, or trade your personal data to third parties. We may share your data only in the following circumstances and only to the extent strictly necessary:

6.1 Third-Party Service Providers (Data Processors)

We engage carefully selected third-party processors who act on our behalf and under our written instructions, including:

a) Third-party administrators (TPAs) for claims processing and medical network management
b) Reinsurance companies for risk underwriting and claims management
c) Payment gateway providers for secure premium collection
d) Credit reference agencies for underwriting checks (where applicable)
e) IT infrastructure, cloud hosting, and cybersecurity service providers
f) Printing and postal service providers for policy document dispatch.

All processors are bound by written Data Processing Agreements (DPAs) requiring them to process data only as instructed, maintain appropriate security measures, and comply with UAE PDPL.

6.2 Regulatory & Legal Disclosure

a) The UAE Data Office, Insurance Authority, Central Bank of UAE (CBUAE), or other competent regulatory authorities where we are required or permitted to do so by law
b) Law enforcement agencies or courts in response to a lawful order, subpoena, or legal process

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c) Licensed credit-referencing agencies as part of the underwriting process (you will be informed where such checks are made).

6.3 Business Transfers

In the event of a merger, acquisition, restructuring, or sale of Orient Takaful or its business, your personal data may be transferred as part of that transaction. You will be notified of any such transfer in accordance with UAE PDPL requirements.

7. Data Retention

Orient Takaful retains your personal data only for as long as it is necessary to fulfil the purposes for which it was collected, or as required by applicable UAE law and regulatory obligations. The following minimum retention periods apply:

Data Category	Retention Period	Legal Basis for Retention
Policy and application data	5 years from policy expiry	UAE Insurance Law / PDPL
Medical and health claims data	25 years from last treatment / claim	ADHICS v2 Requirement
Payment and financial transaction records	5 years from transaction date	UAE Commercial Transactions Law
Regulatory correspondence	7 years	Insurance Authority requirements
Marketing consent records	Until consent withdrawn + 3 years	UAE PDPL / Evidentiary purposes
Technical and usage logs	12 months on a rolling basis	Cybersecurity / Fraud prevention

Upon expiry of the applicable retention period, personal data will be securely deleted, anonymised, or pseudonymised in accordance with Orient Takaful's internal Policies.

8. Your Data Subject Rights

Under the UAE PDPL, you have the following rights in relation to your personal data held by Orient Takaful. Requests should be submitted to otkfl.dataprivacy@orienttakaful.ae We will respond within the timeframes prescribed by the UAE PDPL (generally within 30 days, extendable in complex cases).

Your Right	What This Means
Right of Access	You may request a copy of the personal data we hold about you, along with information about how it is being processed.
Right to Rectification	You may request that inaccurate or incomplete personal data held about you be corrected or updated.
Right to Erasure	You may request deletion of your personal data where it is no longer necessary for the purposes for which it was collected, subject to our legal retention obligations.
Right to Restriction	You may request that we restrict the processing of your personal data in certain circumstances, for example while we investigate a dispute.

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Your Right	What This Means
Right to Object	You may object to processing based on legitimate interests or to the use of your data for direct marketing purposes at any time.
Right to Withdraw Consent	Where processing is based on your consent, you may withdraw consent at any time. Withdrawal will not affect the lawfulness of processing prior to withdrawal.
Right to Complain	You have the right to lodge a complaint with the UAE Data Office (www.uaedataoffice.ae) if you believe your data protection rights have been violated.

9. Data Security

Orient Takaful implements appropriate technical and organisational measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access, in accordance with UAE PDPL requirements, ADHICS, and ISO/IEC 27001:2022.

9.1 Technical Controls

- End-to-end TLS/SSL encryption for all data transmitted through the Portal
- Payment processing through a PCI-DSS Level 1 compliant payment gateway
- Multi-factor authentication (MFA) for all Portal user accounts and internal systems
- Role-based access controls limiting data access to authorised personnel only
- Regular penetration testing and vulnerability assessments of Portal infrastructure.

9.2 Organisational Controls

- Mandatory annual data protection training for all Orient Takaful employees
- Data Processing Agreements with all third-party service providers
- A documented Data Breach Response Policy and cross-functional Incident Response Team (IRT) aligned with UAE PDPL breach notification requirements
- Regular internal audits and external assessments of data processing activities.

Important Notice on Transmission Risk

While we implement rigorous security measures, the transmission of data over the internet carries inherent risks. Any transmission of personal data to Portal is at your own risk. Once we receive your data, we apply strict internal controls to protect it.

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10. Cookies & Tracking Technologies

The Orient Takaful Portal uses cookies and similar tracking technologies to operate effectively, enhance your experience, and analyze usage patterns. By continuing to use the Portal, you consent to our use of cookies in accordance with this Notice.

Cookie Type	Examples	Purpose
Strictly Necessary	Session cookies, CSRF tokens	Essential for Portal functionality and security. Cannot be disabled.
Functional	Language preferences, user settings	Remember your preferences to personalise your experience.
Analytics	Google Analytics, site usage data	Help us understand how users interact with the Portal so we can improve it.
Marketing	Remarketing pixels (where applicable)	Allow us to show relevant Orient Takaful advertisements on other platforms (only with your consent).

You may manage or withdraw cookie consent at any time through your browser settings. Note that disabling strictly necessary cookies may impair Portal functionality.

11. Online Payments

Premium payments made through the Portal are subject to the following:

- All transactions are processed via a secure, PCI-DSS compliant payment gateway. Orient Takaful does not store full payment card numbers.
- By completing a transaction, you authorize Orient Takaful to debit the specified amount from your nominated payment method.
- Orient Takaful shall not be liable for failures, interruptions, or declines resulting from your card issuer, bank, or payment network.
- In the event of an unsuccessful payment, please contact Orient Takaful before retrying to avoid duplicate charges.
- Refunds will be assessed on the merits of each case at the sole discretion of Orient Takaful and processed to the original payment method where applicable.
- Premium amounts quoted on the Portal are subject to change and may vary based on the chosen payment method.

12. Marketing Communications & Opt-Out

With your consent, Orient Takaful may contact you (by telephone, post, email, or SMS) to inform you of insurance products, services, or offers provided by Orient Takaful and its selected partners.

You have the right to opt out of marketing communications at any time by:

- Clicking the “Unsubscribe” link in any marketing email.
- Emailing otkfl.dataprivacy@orienttakaful.ae with the subject line “Marketing Opt-Out”
- Calling Orient Takaful Customer Service on +971 4 601 7500.

Opting out of marketing will not affect your receipt of transactional or policy-related communications which are necessary for the management of your insurance policy.

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13. International Data Transfers

Orient Takaful processes personal data primarily within the United Arab Emirates. Where it becomes necessary to transfer personal data outside the UAE (for example to reinsurers or international service providers), Orient Takaful will ensure that such transfers are only made:

- To countries or territories that the UAE Data Office has determined to provide an adequate level of data protection; or
- Subject to appropriate safeguards such as standard contractual clauses or binding corporate rules approved by the UAE Data Office; or
- Where the transfer is necessary for the performance of your insurance contract or for the establishment, exercise, or defense of legal claims.

14. Children's Data

The Orient Takaful Medical Insurance Portal is intended for use by individuals who are 18 years of age or older. We do not knowingly collect personal data from minors under the age of 18 without the consent of a parent or legal guardian. Where medical insurance coverage includes dependents who are minors, the policy-holder (parent or guardian) is responsible for providing consent on behalf of the minor.

15. User Declaration & Accuracy of Information

By submitting information through the Portal, you confirm that:

- All information, documents, and statements you have provided are true, complete, and accurate
- You have not withheld any material information that may affect the terms of any quotation, proposal, or policy
- You understand that any non-disclosure, misrepresentation, or concealment of a material fact may render your policy null and void from inception without entitlement to a refund
- You have read and agree to these Terms and this Privacy Notice.

16. Governing Law & Jurisdiction

This Privacy Notice and all matters relating to data processing by Orient Takaful shall be governed by and construed in accordance with the laws of the United Arab Emirates, including the UAE PDPL, UAE Cyber Law, and applicable UAE Insurance Authority regulations.

Any disputes arising in connection with this Privacy Notice or the processing of your personal data shall be subject to the exclusive jurisdiction of the UAE courts. Alternatively, you may raise a complaint directly with the UAE Data Office.

17. Updates to This Privacy Notice

Orient Takaful reserves the right to update or amend this Privacy Notice at any time to reflect changes in our data processing practices, operational requirements, or applicable law. Where we make material changes, we will notify you by:

- Publishing the updated Notice on the Portal with a revised effective date
- Displaying a prominent banner notification on the Portal on your next visit
- Where appropriate, notifying you directly by email.

Your continued use of the Portal following the publication of any changes constitutes your acceptance of the updated Notice.

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Version	Document description	Author	Date
1.1	Privacy Notice & Data Protection Policy Ver1.1	Lijo George	15th Jan 2026
1.2	Privacy Notice & Data Protection Policy Ver1.2	Lijo George	31st Mar 2026
1.3	Privacy Notice & Data Protection Policy Ver1.3	Lijo George	24th Sep 2026

This Privacy Notice has been reviewed and approved:
This Privacy Notice is issued by Orient Takaful. For queries, contact our Data Protection Office at otkfl.dataprivacy@orienttakaful.ae

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