

Polished & Enriched Data Protection Policy

NMK Electronics Trading LLC (Part of the Midwich Group)

Updated: March 2026

1. Purpose and Significance

This Policy establishes the framework for protecting personal and operational data processed by the Company in accordance with UAE PDPL, UAE Modern Technology-Based Trade Law, and Midwich Group global standards.

2. Scope

This Policy applies to all employees, contractors, partners, and third-party processors handling personal data, business data, transactional information, and digital integrations.

3. Definitions

Standard PDPL definitions for Personal Data, Processing, Controller, Processor, and Data Subject apply.

4. Contact Person

Email: compliance@nmkelectronics.com

Address: Showroom 2-3, Building MJ Al-Falasi, Al Quoz 1, Dubai, UAE

5. Principles for Processing Personal and Operational Data

Processing must follow lawfulness, fairness, transparency, purpose limitation, minimisation, accuracy, confidentiality, and security. Additional B2B obligations include truthful representation of product/operational information, secure technology infrastructure, and compliance with digital trade expectations.

6. Special Categories of Personal Data

Sensitive data requires explicit consent and enhanced protection.

7. Accountability

The Company maintains processing records, conducts DPIAs, audits partners, and reviews the policy annually.

8. Processor and Third-Party Partner Management

Partners must comply with PDPL, maintain secure digital infrastructure, implement encryption and cyber controls, ensure accuracy of information, and cooperate with compliance and regulatory inquiries.

9. Data Transfer

Cross-border transfers must follow PDPL adequacy and safeguard requirements and UAE executive regulations.

10. Personal Data Breaches

Breaches must be reported to the UAE Data Office. Documentation, investigation, and notifications are mandatory.

11. Data Subject Rights

Rights include access, correction, deletion, restriction, objection, and portability.

12. Complaints

Complaints may be submitted internally or to the UAE Data Office.

13. Requests for Information

Data may only be shared legally or for legitimate business interests. Accuracy verification is required before disclosure.

14. Awareness & Training

Mandatory training covers PDPL, UAE digital trade compliance, cybersecurity, and accurate data practices.

15. Confidentiality

Employees must maintain confidentiality over all personal, operational, and commercial data.

16. Security of Processing

Measures include encryption, secure API/cloud configurations, access control, business continuity, and regular testing.

17. Breaches of this Policy

Violations are handled under the Company's disciplinary framework.

18. Updates to this Policy

This Policy will be updated to reflect legal, regulatory, technological, and internal compliance developments.