

APPLICANT PRIVACY POLICY

Ohana values your trust and is committed to the responsible management, use and protection of personal information. This Applicant Privacy Policy (“**Policy**”) describes our practices in connection with all the information that we collect through the Careers section of our website (located [here](#)) (“**Careers Site**”), other career websites like LinkedIn or Glassdoor, online job boards, and offline in connection with your application for a job or internship with Ohana or one of our affiliates. Personal information submitted elsewhere on Ohana’s and its affiliates’ web sites will be used in accordance with our general online [Global Privacy Policy](#).

PERSONAL INFORMATION WE COLLECT

Information You Provide

We collect information from you in connection with your application, which may include the following:

- Name, address, telephone number, e-mail address, and other contact information;
- Username and password;
- Right to work (visa) status;
- CV, résumé, or cover letter (i.e., previous work experience, education information, and skills);
- Professional and other work-related licenses, permits and certifications held;
- Information relating to referees; and
- Any other information you elect to provide to us (e.g., employment preferences, willingness to relocate, current salary, desired salary, awards or professional memberships).

In certain cases, such as with US applicants, we will ask questions about race/ethnic origin, gender, protected status (e.g., veteran), and disability of our applicants, as required by applicable law for equal employment opportunity purposes. We may also inquire about criminal records and credit history where permitted or required by law. We will do so only where permitted by applicable law. Otherwise, we ask that you avoid submitting information which may qualify as sensitive information unless we specifically request it. Sensitive information includes race, religion, ethnicity, nationality or national origin, age, gender identity, sex life or practices or sexual orientation, marital status, medical or health information (including disability status), genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, veteran status, background check information, judicial data such as criminal records or information on other judicial or administrative proceedings.

Any information you submit through the Careers Site or otherwise in connection with an employment application must be true, complete and not misleading. Submitting inaccurate, incomplete, or misleading information may lead to a rejection of your application during the application process or disciplinary action including immediate termination of employment if discovered post hire.

If you provide us with personal information of a referee or any other individual as part of your application, it is your responsibility to obtain the proper permission from that individual prior to providing their personal information to us.

Information from Other Sources

For the purpose of background checks (including education verification, employment verification, criminal checks and reference checks) in connection with your application, and as permitted by applicable law, Ohana obtains information about you from other sources, which may include the following:

- Your references;
- Prior employers;
- Educational institutions you attended;
- Sanctioned party databases;
- Background check providers;
- Professional Social Media Platforms (e.g., LinkedIn)

COLLECTION AND USE OF INFORMATION

We collect and process information about you for one or more of these reasons:

- Because you voluntarily provide this information and consent for us to process it during the application process;
- Because this information is necessary to take steps at your request prior to entering into an employment, internship, or contracting relationship;
- Because we have a specific legitimate interest under law to process it;
- To comply with a legal obligation, such as equal employment opportunity reporting; or
- Because this information is necessary to perform our contractual obligations with you or to take pre-contractual steps at your request, such as preparing a contract of employment for you following a decision to make you an offer of employment.

Where the collection or processing is based on your consent, you may withdraw your consent at any time to the extent permitted by applicable law.

HOW WE USE YOUR INFORMATION

The information that you submit on the Careers Site or otherwise in connection with an employment application will be used for Ohana's global personnel recruitment, management and planning purposes, as permitted by applicable law:

- To process your application. We will engage in these activities to manage our prospective contractual relationship with you;
- To assess your capabilities and qualifications for a job. We will engage in these activities to manage our prospective contractual relationship with you;
- To conduct reference checks. We will engage in these activities to comply with a legal obligation;

- To respond to your inquiries and communicate with you about your application, and to send you information regarding the Careers Site and changes to our terms and policies. We will engage in these activities to manage our prospective contractual relationship with you;
- To comply with or monitor compliance with any applicable law or regulation, such as equal employment opportunity reporting;
- To conduct background checks if we offer you a position;
- To preserve our other legitimate interests, for example, for Ohana’s administrative purposes, aggregate management reporting, internal training, and as generally required to conduct our business within Ohana and its affiliates;
- If we hire you, personal information we collect in connection with your application can be incorporated into our human resources system and used to manage the new-hire process; any such information can become part of your employee file and used for other employment-related purposes;
- If you sign up for our Talent Network, our recruiters will contact you about jobs you may be interested in, job fairs, and online career webinars;
- If you sign up for job alerts, you will receive email or SMS messages about Ohana positions meeting the criteria you’ve selected; and
- We do not sell your personal information.

The information about you will be added to Ohana’s international candidate database and can be retained and used to consider you for opportunities at Ohana and its affiliates other than the one(s) for which you apply. If you do not wish us to do this, please contact us at info@ohana.ae

Providing personal information to us through the Careers Site or otherwise in connection with an employment application is voluntary. However, if you do not provide sufficient information Ohana may be unable to consider your employment application or onboard you as an employee, should you be successful in your application.

DISCLOSURE AND TRANSFER OF INFORMATION

Ohana shares personal information with affiliates that are involved in evaluating candidates for a given position. Ohana will remain responsible for personal information that is jointly used with affiliates. You can consult the list and location of our affiliates [here](#).

We will limit access to personal information to those personnel within our business who need access to the information, for the purposes described in this Policy, including personnel in the recruiting, human resources, legal and information technology departments, and in the department responsible for the position for which you are applying.

Ohana also shares personal information with our third-party service providers to facilitate services they provide to us, including hosting and operating the Careers Site, recruiting assistance, and background check processing.

Disclosing your personal information can include transferring personal information to other countries, including the United States or any other country in which we or our service providers have operations. This may include countries outside of the European Economic Area (“EEA”). Some of these countries are recognized by the European Commission as providing an adequate level of protection according to EEA standards (the full list of these countries is available [here](#)). As for transfers to other countries, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission, to protect your information. You may obtain a copy of these measures by contacting the Privacy Office at Privacy@Ohana.ae

We also use and disclose your personal information as necessary or appropriate, where we have a legal obligation or legitimate interest to do so:

- To comply with applicable law.
 - This can include laws outside your country of residence.
- To respond to requests from public and government authorities.
 - These can include authorities outside your country of residence.
- To cooperate with law enforcement. ○ For example, when we receive law enforcement requests and orders.
- For other legal reasons, including:
 - To enforce our terms and conditions;
 - To comply with legally required requests for disclosure, such as subpoenas, and ○ To protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.
- In connection with a sale or business transaction.
 - We have a legitimate interest in disclosing or transferring your personal information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

DATA RETENTION

We will retain personal information for the period necessary to fulfil the purposes outlined in this Policy unless a longer retention period is required or permitted by law. The criteria used to determine our retention periods are: (i) the duration of the application process; (ii) as long as we have an ongoing relationship with you; (iii) as required by a legal obligation to which we are subject; and (iv) as advisable in light of our legal position (such as in regard of applicable statutes of limitations, litigation, or regulatory investigations).

We may remove personal information for inactive accounts from our database, subject to any applicable legal or regulatory obligations. Furthermore, Ohana can delete personal information about you (including your CV/résumé) from our database at any time and without providing any reason. Therefore, please retain your own copy of the personal information provided to us.

PASSIVE INFORMATION COLLECTION: COOKIES AND SIMILAR TECHNOLOGY

We and our service providers use “cookies” and similar technologies on the Careers Site. Please see our [Cookie Policy](#) for more information.

CHOICES AND ACCESS

If you register on the Careers Site, you may access, review, and change your personal information stored therein by logging into the Careers Site and updating your account information. The updated profile will be used as the default the next time you apply for a job using your account online. To change personal information that you have already submitted for consideration for a specific position, please update your profile and resubmit your application for that position. We encourage you to promptly update your personal information if it changes or is inaccurate.

If you would like to exercise your rights, as further described in the [Global Privacy Policy](#), such as to review, correct, update, suppress, restrict or delete personal information, object to the processing of personal information, withdraw consent or if you would like to request to receive an electronic copy of your personal information 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 at Privacy@Ohana.ae. We will respond to your request consistent with applicable law.

In your request, please make clear what personal information you would like to access or have changed, whether you would like to have personal information that you have provided to us suppressed from our database.

For your protection, we may need to verify your identity before implementing your request. Please note that certain personal information may be exempt from such requests pursuant to applicable data protection laws or other laws and regulations.

ADDITIONAL INFORMATION FOR THE EEA

You also may:

- Contact us at Privacy@Ohana.ae with any questions about this Policy
- Lodge a complaint with a data protection authority for your country or region (e.g., [EU](#) and [Australia](#)), or in the place of the alleged misconduct.

SECURITY

We seek to use reasonable organizational, technical and administrative measures to protect personal information 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 “*Contact Us*” section below.

LINKS TO THIRD-PARTY WEBSITES

This Policy 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 Careers Site links. The inclusion of a link on the Careers Site does not imply endorsement of the linked site or service by Ohana or our affiliates.

LAW APPLICABLE TO JOB APPLICATION

The Careers Site allows you to apply for jobs world-wide, as a benefit of Ohana’s centralized global recruitment function. This Careers Site is operated from the United States. Accordingly, any personal information you submit to the Careers Site will be collected in the United States and will be subject to

U.S. laws. However, if we share your personal information with an affiliate located in another country in its capacity as a potential employer, the affiliate will handle your personal information in accordance with this Policy. Any hiring or other employment-related decisions will be made by the hiring affiliate in accordance with the laws of the country where the job will be located. **ABOUT CHILDREN**

The Careers Site is not intended for minors under the age of 16.

CHANGES TO THE POLICY

We reserve the right to amend this Policy at any time in order to address future developments of Ohana, the Careers Site or changes in industry or legal trends. The “Last Updated” legend at the top of this Policy indicates when this Policy was last revised. Any changes will become effective when we post the revised Policy on the Careers Site.

The Careers Site is not intended for distribution to, or use by, any person or entity in any jurisdiction or country where such distribution or use would be contrary to local law or regulation.

CONTACT US

If you have questions or requests, please feel free to contact us at Privacy@Ohana.ae

Because email communications are not always secure, please do not include sensitive information in your emails to us.

Data Protection Information

This data protection information is directed to the applicants (“you” or “data subject”), using this application platform to apply for a job at COMPANY1 (an affiliate of COMPANY2 Corporation) or at one of its affiliates (“we”).

It provides information on how we process your personal data within the application / recruiting process when applying through the application platform. The term "personal data" means any information relating to a (natural) person by means of which that person can be identified directly or indirectly.

This document aims to provide you with an understandable, transparent and concise explanation of how we intend to process your data. However, should you require further explanations relating to data protection, please do not hesitate to contact us.

1. Controller

The controller which is responsible for the processing of your personal data is the legal entity named in the job offer as employer. You can find the contact details of the respective controller in Annex 1.

2. Data Protection Department

You can contact our data protection department here:

e-mail:

3. Purposes and Legal Basis

We as controller process your personal data on the application website, in the application / recruiting process and in the talent pool for the following purposes and based on the following legal bases.

3.1 Application Tracking System

To manage the job offers we create and the applications we receive, we use an Application Tracking System (ATS) called “Oleeo”, provided by Oleeo Inc. and used by Korn Ferry (DE) GmbH as our data processor. The use of the ATS enables us to process the application documents quickly and efficiently.

a) Account Creation

To have access to the job offers (and to apply to the offer) it is necessary to create a user account. The account can also be created without submitting an application for one of the job offers.

aa) Consent

There are different purposes based on your consent we pursue in the account creating process:

- To enable participation in the application process and to establish standardized application conditions,
- To provide an infrastructure for the application.

We obtain the following consent from you:

“By clicking the option “I consent” I declare that I consent to the processing of my personal data to create an account für the application platform. The processing of my personal data is described in the Data Protection Information, which I have taken note of. I am aware that I can withdraw my consent anytime. My consent is freely given.”

bb) Legitimate Interest

Furthermore, we process your data to protect our legitimate interests or those of third parties, especially for the following purpose

- To protect us from bots and other non-human access to the application page and from other digital threats.

cc) Performance of a Contract

Beside the creation of the account, you can add personal data to your account before or without applying to a specific job offer or you can start to fill in the application form without submitting it. This is to be considered the beginning of the application process. Under these circumstances, your data are processed for the following purposes:

- Sending reminders about unsent applications,
- Simplification of the application process(es) by collecting data from you that is independent of the job offer.

b) Application / Recruiting Process

aa) Performance of a Contract

Your personal data will be processed to review your application for a specific job and in this context in particular for the following purposes:

- Examination and assessment of your suitability for the job,
- Performance and behavioral assessment to the extent permitted by law; this may include background-checks, depending on your local law,
- If necessary, for the preparation of the offer / employment contract and to send related documents to you,
- Coordinate the application process, internal alignments on applicants, if necessary, involvement of the works council, and the onboarding process,
- Internal and external communication, contract-related communication (including interviews) with you,
- Information on the outcome of your application,
- Travel management, travel booking and travel expense accounting for interviews with you,
- Cost recording, controlling and reporting,
- Statistical evaluations for corporate management,
- Assertion of legal claims and defense in legal disputes regarding your application, and
- To ensure general security and in particular IT security.

bb) Legitimate Interest

If the processing of your data goes beyond fulfilling a contract, we process the data to protect our legitimate interests or those of third parties. Processing will only take place if there are no overriding interests against such processing. This in particular applies for the purposes of:

- Enrichment of our data about you, e.g. by using or researching publicly available data where necessary and allowed,
- Reviewing the current phase of finding a suitable applicant for the job in general and status checks,
- Development of evaluation schemes and measures to enhance existing processes in the application process,
- Internal and external investigations, including security checks,
- Improvement of the content and presentation of future job offers,
- Improvement of our performance in the application process,
- Documentation of the application process to track our processors performance as well as for quality control through appropriate documentation and reporting.

cc) Consent

In selected cases, we process your personal data based on your express consent. This applies in particular to the following purpose:

- Using SMS to contact you about status updates on your application and new job offers, for coordination and for general communication purposes.

We obtain the following consent from you:

“By choosing the option “yes” I declare that I consent to the processing of my personal data to be informed by SMS about the status of my application, on new job offers posted on this platform and related topics. The processing of my personal data is described in the Data Protection Information, which I have taken note of. I am aware that I can withdraw my consent anytime. My consent is freely given. If I do not provide my consent, this has no disadvantages to my application whatsoever.”

dd) Compliance with Legal Obligations

Employers are subject to a variety of legal obligations, which may be statutory requirements, but may also include regulatory or other official requirements. The specific obligations and requirements depend on the applicable law. To fulfill these obligations and requirements we may process your personal data. In this context, the processing is in particular for the following purposes:

- Fulfilment of legal obligations in the areas of company law, social law, tax law, in particular regarding control and reporting obligations (if applicable),
- reporting obligations to third parties, e.g. employers' liability insurance associations (if applicable),
- If necessary, conducting the process for issuing a work permit/residency permit,
- storage of data as part of official or court orders.

3.2 Talent Pool

We offer access to a Talent Pool to forward you future job offers. Your personal data will be processed on basis of your consent to inform you about job offers you are qualified for and to

invite you to submit your application for these specific job offers. In this context, your personal data is processed for the following purposes:

- Collection of data from applicants to facilitate the submission of other job offers,
- To pre-qualify your suitability for other, yet unspecified, job offers,
- Contacting you with information about open job offers and asking you to participate in the application process,
- Transferring your personal data as used in other application to the new application / recruiting process,
- Preparation of the transition to the application process,
- Evaluation and assessment of the applicant market and, if necessary, adaptation of the job offers to be created.

We obtain the following consent from you:

“By choosing the option “yes” I declare that I consent to the processing of my personal data in order to be included in the Talent Pool and to be considered for future job offers. The processing of my personal data is described in the Data Protection Information, which I have taken note of. I am aware that I can withdraw my consent at any time. My consent is freely given. Giving my consent does not entail any advantages or disadvantages for current or future applications.”

3.3 Cookies

We and certain third parties use cookies on our website to make your visit to our website more attractive and to enable the use of certain functions. These are small text files that are stored on your end device. Some of the cookies we use are deleted after the end of the browser session, i.e. after you close your browser (so-called session cookies). Other cookies remain on your end device and enable us or our partner companies to recognize your browser on your next visit (persistent cookies).

aa) Legitimate Interest

We use cookies to ensure that our website functions properly. Some elements of our website require that the accessing browser can be identified. Some functions of our website cannot be offered without the use of cookies. These are technically necessary cookies.

bb) Consent

We also use cookies on our website that enable us to track your behavior. The purpose of using analytics cookies is to improve the quality of our website and its content. Through the analysis cookies, we learn how the website is used and can thus constantly optimise our offer. When accessing our website, the user is informed about the use of cookies for analysis purposes and their consent to the processing of the personal data used in this context is obtained. In this context, reference is also made to this privacy policy.

Find more information in our Cookie-Policy.

4. Sources of Collection

Your personal data is collected from the following sources:

The personal information directly collected from you when the application profile is set up (e.g., name, contact details), when the application form is filled in (e.g. former employers) as well as during the processes described above. Furthermore, technical data is collected when you use application platform (e.g. your cookie preferences). In addition, and to the extent permitted by law and / or covered by your consent, we collect data from other sources, for example from previous employers.

5. Categories of Processed Data

Depending on the specific scenario, we process the following categories of data:

- Contact data, such as title, name(s) und surname, email address, telephone number (for calls and text messages), postal address (country, state, postal code, city, home address), password, etc.
- Qualification data such as employment eligibility, age, necessity of sponsoring, SAP certification, languages und fluency, preferred language, etc.
- Biographical data / Employment data, such as current / last employer – especially if we are the current employer / a former employer –, data contained in the CV, etc.
- Further data, such as inclusion to talent pool, source of information about the job offer, etc.
- Technical information, cookie preferences, etc.

6. Categories of recipients of data and data transfers

By perusing the purposes mentioned above (see 3. Purposes and Legal Basis), data may be transferred to various locations. Your data will be passed on to those internal and external departments or organisational units that require your data (such as managers who are involved in the decision on staffing, accounting, etc.) in order to fulfil our contractual and legal obligations or to act within the scope of processing for our legitimate interests. If required by law, we will be forward your data to the works council to inform the council or to obtain its' consent.

We may also transfer your personal data if you participate in the talent pool and the job is advertised in one of our other subsidiaries or affiliates. A list of all subsidiaries and affiliates can be found in Annex 1. Further, your data will be passed on to external bodies, especially to our service providers.

The transfers to our internal departments, our subsidiaries and affiliates or to our service providers may include the transfer of personal data to European and non-European countries as well as the storage of data outside the European Union. Where we transfer personal information to a country or framework not determined by the competent authorities as providing an adequate level of protection for personal data, the transfers will be under an agreement which covers applicable local and in particular European Union requirements for such transfers, such as standard contractual clauses. The European Commission approved standard contractual clauses are available [here](#).

7. Your Rights

Under the applicable data protection law, you may have the following rights with respect to your personal data.

7.1 Access

You may request information from us at any time as to whether we have stored your personal data and which personal data are involved and to access information on automated decision making. We provide this information to you free of charge. The right of access also includes the right to request the disclosure of any personal data that might have been obtained without consent.

The right of access does not exist or is subject to limitations if and to the extent that confidential information, such as information that is subject to professional secrecy, would be disclosed.

7.2 Rectification

If your personal data, which is stored by us, is inaccurate or incomplete, you have the right to demand at any time that we rectify this.

7.3 Erasure

You have the right to demand that we erase your personal data if and to the extent that the data is no longer needed for the purposes for which it was collected, or if the data is processed based on your consent and you have opted to revoke your consent. In such cases, we cease processing your personal data and remove that data from its IT systems and databases.

The right to erasure does not apply if

- the data may not be deleted due to a statutory obligation or must be processed due to a statutory obligation, or
- the processing of data is necessary for the establishment, exercise or defense of legal claims.

7.4 Restriction of Processing

You have the right to demand that we restrict the processing of your personal data. This right may exist – depending on your jurisdiction – particularly but not only in the following scenarios:

- When we are assessing a rectification request of the data subject,
- When the data subject demands it in respect to data that otherwise would have to be deleted because of an expired retention period,
- When we are assessing an objection request of the data subject.

7.5 Data Portability

You have the right to receive from us the data provided by you in a structured, commonly used, machine-readable format as well as the right to have these data transmitted to a different controller. This right may – based on your jurisdiction – exist only if

- you have made this data available to us on the basis of consent or an agreement entered into with you, and
- the processing is carried out by automated means.

7.6 Object to Processing

If your data is processed by us based on legitimate interest or if your data is shared with or sold to third parties or subject to automated decision making, you have the right to object at any time to our processing. You might – based on your jurisdiction – also have a right to object processing in the following scenarios:

- Your data are processed in regard to a legal claim
- Your data are processed for direct marketing or scientific, historical or statistical research.

7.7 Withdraw Consent

If, as required by applicable local laws, we obtained consent from you regarding the described data processing operations, the following applies:

Consent to data processing is voluntary and may be withdrawn by you at any time with effect for the future. Such withdrawal has no negative effect for you other than the potential result that we cannot proceed processing your data for the above-mentioned purposes.

If you wish to withdraw your consent, simply send your withdrawal of consent by email to the addressees mentioned below.

7.8 Non-Discrimination

This right states that when you submit an access, deletion request etc. to us, we cannot base any legal or other consequences based on the fact that you made use of your data subject rights.

You may assert any and all of the data subject rights described above against us by addressing your specific requests via the following channel:

8. Right to Lodge a Complaint

You have the right to lodge a complaint with a competent data protection supervisory authority if you believe that the processing of your personal data infringes applicable data protection law.

9. Duration of Data Storage

We will store and process your personal data for as long as it is necessary to fulfill the purposes of processing described herein. If your personal data is subject to statutory retention requirements or is contained in documents which are subject to statutory retention requirements, we will store such data for the duration of the stipulated statutory retention period.

The retention periods to which we are subject vary and depend on the applicable laws and the outcome of the application process, as well as whether you participate in the talent pool.

10. Updates

Updates to this data protection information will regularly be published on this website.

11. Consequences of Not Providing Personal Data

As an applicant, we might not be able to communicate with you and to further consider you in the application / recruiting process, if you do not provide the required personal data in the mandatory fields. The non-disclosure of (personal) data in other fields, especially in non-mandatory fields, does not lead to any negative consequences for your application process.

ANNEX 1:

Legal Entity	Company Address
COMPANY	Address goes here
COMPANY	Address goes here
COMPANY	Address goes here

Addendum to Applicant Privacy Policy & Data Protection Information

This Addendum (“Addendum”) supplements and overrides conflicting terms in the following documents:

- 1. Applicant Privacy Policy issued by Korn Ferry**
- 2. Data Protection Information for Applicants**

1. Applicability & Precedence

This Addendum prevails over any conflicting privacy or data processing terms contained in the referenced documents.

2. Compliance with UAE & ADGM Laws

- The Processor shall comply with UAE Federal Decree-Law No. 45 of 2021, Cabinet Resolution No. 34/2022, ADGM Data Protection Regulations 2021, and all applicable Abu Dhabi regulations.

3. Purpose Limitation

- The Processor shall process personal data solely for recruitment services for the Ohana Group. The Processor shall not:
 - Add applicants to global talent pools without prior written approval,
 - Use applicant data for unrelated job postings,
 - Reuse or share applicant data with third parties or affiliates without explicit written approval.
- Confidentiality of Ohana Group Information
- The Processor must protect all confidential information relating to Ohana Group, including business, financial, operational, regulatory, contractual, and strategic information.

5. International Transfers & Data Localisation

- No transfer of applicant data outside the UAE or ADGM jurisdictions is permitted without prior written approval from Ohana and appropriate safeguards (SCCs, localisation requirements, etc.).

6. Data Retention & Deletion

- Retention periods shall be determined solely by Ohana. Upon request, Processor shall delete all data (including backups, logs, derivatives) within 10 days and provide written confirmation.

7. Data Breach Notification & Cooperation

- Processor shall notify Ohana within 24 hours of any personal data breach or security incident and shall bear all costs associated with remediation, investigation, and notification.

8. Indemnity

- Processor shall fully indemnify Ohana Group for all losses, liabilities, penalties, costs, and damages arising from breaches of this Addendum or data protection law.

9. Sub-Processing Restrictions

- Processor shall not appoint any sub-processor (including ATS providers) without prior written approval and binding back-to-back obligations.

10. Audit Rights

Ohana may audit Processor systems, policies, and controls with written notice.

11. Governing Law & Jurisdiction

- This Addendum shall be governed by UAE law, with jurisdiction in Abu Dhabi Courts unless ADGM arbitration is mutually adopted.