

# MH Estate Reality LLC – Data Privacy Policy

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Effective Date: 10/06/2025

Company Name: MH Estate Reality LLC

Registered in: Dubai, United Arab Emirates

Regulated by: RERA and the UAE Data Office,

DED License number: 1398755 ; RERA ORN.: 44653

## 1. Purpose of the Policy

This Data Privacy Policy outlines how MH Estate Reality LLC collects, stores, uses, and protects personal data of clients, vendors, and website users in the course of providing real estate brokerage services. It ensures full compliance with UAE data protection laws and RERA operational standards.

## 2. Legal Basis for Processing Personal Data

We process personal data based on:

- Client consent (for marketing, optional services)
- Legal obligation (AML laws, RERA inspections, transaction records)
- Contractual necessity (brokerage agreements, tenancy, sales transactions)
- Legitimate business interest (service improvement, fraud detection)

## 3. Categories of Personal Data Collected

Identity Data: Name, nationality, Emirates ID, passport number, date of birth

Contact Data: Phone number, email, physical address

Financial Data: Source of funds, bank statements, salary certificates, cash origin

Property Transaction Data: Title deeds, NOC, sales contracts, tenancy agreements

Digital Interaction Data: IP address, cookies, user location, website usage behavior

Compliance Documents: KYC forms, STR details (if applicable), goAML reference numbers

## **4. Sources of Personal Data**

- Direct client onboarding forms (in person, online)
- Regulatory due diligence (RERA, DLD, FIU via goAML)
- Public records (Ejari, Oqood, DLD title verification)
- Authorized third-party verification services (banks, legal reps)

## **5. Data Collection During Brokerage Transactions**

Inquiry & Consultation: Name, contact info - Communication, booking viewings

Property Viewing: ID copy (optional), mobile - Recordkeeping, agent-client matching

Offer Submission: Passport/ID, source of funds - Transaction legitimacy, client assessment

Sales/Rental Agreement: All documents for buyer/tenant/seller/landlord - DLD/RERA compliance, contract preparation

Title Transfer/Tenancy: DLD documents, power of attorney (if applicable) - Legal registration, transaction finalization

After-Sales Support: Contact history, feedback - Relationship management, dispute resolution

## **6. Use of Personal Data**

- Executing real estate brokerage services
- Identity verification and client risk assessment
- Complying with goAML and Ministry of Economy regulations
- Facilitating transfers with DLD, RERA, or Ejari
- Internal auditing, record retention, and service improvement

## **7. Data Sharing & Disclosure**

All third parties are bound by confidentiality agreements and data processing contracts in line with UAE law.

- Government bodies (DLD, RERA, FIU, Ministry of Economy)
- Financial institutions (banks, mortgage providers)
- Third-party service providers (legal consultants, valuation firms)
- Platform providers (Ejari, goAML portal, CRM tools)

## **8. Data Retention Policy**

All transactional and identity documents are retained for a minimum of 5 years (as per AML law). Digital interactions (logs, emails, cookies) are retained for 2 years, unless longer retention is required by regulators. Data may be archived securely for audit and inspection purposes by RERA or the FIU.

## **9. Security Measures**

- Encrypted storage for digital records and ID scans
- Two-factor authentication for system access
- Access control for data-sensitive roles (AML officer, broker manager)
- Data breach response procedure with reporting to UAE Data Office within 72 hours of detection

## **10. Client Rights**

- Request access to your personal data
- Request correction or update of inaccurate data
- Request deletion, subject to legal obligations
- Withdraw consent for non-essential data uses (e.g., marketing)
- Lodge a complaint with the UAE Data Office

To exercise your rights, please contact our Data Protection Officer at: [info@mhestate.ae](mailto:info@mhestate.ae)

## **11. Cookies & Online Tracking**

Our website may use session cookies (to enable search and filter functionality) and analytics cookies (to measure user engagement). You may disable cookies via your browser settings, but some site features may not function properly.

## **12. Policy Updates**

We reserve the right to modify this Privacy Policy to reflect changes in UAE data protection legislation, AML/CFT reporting obligations (goAML), and RERA operational guidelines. Changes will be posted on our website with updated effective dates.

## **13. Contact Details**

Data Protection Officer: Brigitta dr. Magyari-Horvath

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