



PRIVACY STATEMENT

Last updated: 11 June 2026

INTRODUCTION

The website www.fareyallp.com (the Site) is operated by Fareya Azfar & Araoui LLP (“we”, “us”, “our”), a limited liability partnership established in Abu Dhabi Global Market (ADGM) with its principal offices at Level 35, Al Maqam Tower, Abu Dhabi Global Market Square, Al Maryah Island, Abu Dhabi, United Arab Emirates.

We are committed to protecting your privacy and complying with our data protection obligations under the ADGM Data Protection Regulations 2021 and any other applicable data protection legislation (together, "Data Protection Law").

When you interact with us or use the Site, we act as the data controller of your personal data. This means that we are responsible for processing your personal data and deciding how to use it. This privacy policy explains the types of personal data we may collect about you, why we collect it, what we use it for, and what rights you have over that data.

This policy may be updated from time to time. We will post any updates on the Site and indicate the date of the most recent revision at the top of the page. We encourage you to check the Site periodically to review any changes.

CONTACT INFORMATION

If you have any concerns or questions regarding this policy or our data practices, you may contact Fareya Azfar at contact@fareyallp.com or on +971 56 170 7240.

WHAT INFORMATION DO WE COLLECT?

We collect, store, and use the following types of personal data:

- (a) Name and contact details
- (b) Email address and communication records
- (c) Browser, device and site usage data

- (d) Information collected through forms
- (e) Any personal data included in correspondence with us

CONTACT DATABASE

We may use publicly available information about you or information you have provided us with to add to our contact database. Information that we typically hold in our database may include:

- (a) your contact information, including your name, job title, organisation's name, address, phone number(s), email address(es) and other identification information;
- (b) the area(s) of law or business that you practice or have an interest in.

Once your details are included in Walkers' contact database, we may also record details of any:

- (f) Our mailing lists you have subscribed to or unsubscribed from;
- (g) mailings (including legal advisories and event invitations) we have sent you;
- (h) hyperlinks you have clicked in any mailing that we have sent you;
- (i) meetings we have held with you;
- (j) event invitations you have replied to; and
- (k) events you have attended.

From time to time, we may ask you by email to review your contact details and mailing list preferences and update them as necessary. This not only helps us to keep the contact information we hold about you up to date, it also ensures that we only send you information that you have requested and/or is relevant to you.

HOW WILL WE USE YOUR PERSONAL DATA?

We use your personal data for the following purposes:

- (a) To respond to your inquiries or provide information you request
- (b) To improve our Site functionality and user experience
- (c) To comply with legal and regulatory obligations
- (d) To send newsletters or updates if you have opted in

For anti-money laundering, compliance, or fraud prevention purposes

We will not use your personal data for automated decision-making, including profiling, without your explicit consent.

HOW DO WE SHARE YOUR PERSONAL DATA?

We may share your personal data:

- (a) With employees, contractors, and consultants of the firm
- (b) With service providers such as IT, hosting, and analytics providers
- (c) Where required by law or regulation, including with ADGM authorities or UAE federal authorities.
- (d) If necessary to establish, exercise or defend legal claims

If we transfer personal data outside the ADGM, we will ensure appropriate safeguards are in place in accordance with ADGM Data Protection Regulations.

THIRD PARTY LINKS

The Site may contain links to third-party websites. We do not control and are not responsible for the content or privacy practices of such websites. We recommend that you review their privacy policies separately.

YOUR RIGHTS

Under the ADGM Data Protection Regulations 2021, you have the right to:

- (a) Access your personal data
- (b) Request correction of inaccurate or incomplete data
- (c) Request erasure of your data in certain circumstances
- (d) Object to or restrict processing in certain cases
- (e) Withdraw consent where processing is based on consent
- (f) Request data portability

To exercise these rights, contact us using the details above. We may require you to verify your identity before responding.

If you believe your data has been processed unlawfully, you may lodge a complaint with the Office of Data Protection at ADGM. Contact details and procedures are available at: <https://www.adgm.com/operating-in-adgm/office-of-data-protection>

DATA RETENTION

We retain your personal data only as long as necessary for the purposes stated in this policy or as required by law. When data is no longer required, it is securely deleted or anonymised.

SECURITY

We implement appropriate technical and organizational measures to protect your personal data from unauthorized access, disclosure, alteration or destruction. However, no system is entirely secure, and we cannot guarantee absolute security.

LAWFUL BASIS FOR PROCESSING

We will only process personal data where we have a lawful basis, which may include:

- (a) Your consent
- (b) Performance of a contract
- (c) Compliance with a legal obligation
- (d) Protection of vital interests
- (e) Public interest tasks

Our legitimate interests, provided these are not overridden by your rights and interests

COOKIES

We may use cookies or similar technologies to improve your experience on our Site. You can manage or disable cookies through your browser settings. Consent will be requested where required.

TABLE OF PERSONAL DATA WE PROCESS

Category of Data	Purpose of Processing	Lawful Basis	Retention Period
Name and contact details	Respond to inquiries, manage client communications	Consent, Legitimate Interest	3 years or until consent withdrawn
Email address and communication logs	Send newsletters, provide updates, record interactions	Consent, Legal Obligation	3 years or as legally required
Browser, device and site usage data	Website performance monitoring, analytics	Legitimate Interest	12 months
Form submissions	Evaluate requests, provide information or legal services	Consent, Performance of Contract	3 years or as required for client records
Anti-money laundering and compliance data	Verify identity, comply with regulatory obligations	Legal Obligation	5 years from last interaction or as required
IP address and location data	Site analytics and fraud prevention	Legitimate Interest	12 months
Application and onboarding data	Evaluate and respond to job applications and client inquiries	Consent, Performance of Contract, Legal Obligation	6 months (job applications), 5 years (clients)

ADDITIONAL INFORMATION ON DATA SOURCES AND TRANSFERS

Sources of Personal Data

We collect personal data from the following sources:

- (a) Directly from you via our website forms, email, WhatsApp, SMS, or other communication platforms
- (b) From external legal counsel, lawyers, or other professionals referring you to us
- (c) From AML and background check service providers
- (d) From documentation you provide for onboarding, compliance, or contractual purposes

Special Categories of Data

We generally do not collect special categories of data unless required for legal compliance. However, in the context of AML due diligence, we may collect and store sensitive documents such as

- (a) Identification documents (e.g., passports, Emirates IDs)
- (b) Proof of address or ownership
- (c) Financial statements and declaration

These are retained strictly to comply with AML regulations and professional obligations under ADGM law.

Data Transfers and International Access

Your personal data may be accessed by team members located outside the ADGM, including when working remotely. In such cases, access is secured through cloud-based platforms and governed by confidentiality obligations.

We may also transfer or store your data with third-party cloud service providers and legal technology platforms that are located outside ADGM. These providers are selected based on secure processing standards and contractual safeguards in line with ADGM regulations.

Direct Marketing and Communications

We may send legal updates, newsletters, or event invitations via email using tools such as Mailchimp. These communications are sent only to those who have consented or to those with whom we have a prior professional relationship. You may unsubscribe at any time using the opt-out link or by contacting us.

CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time. All changes will be published on this page and dated. Continued use of the Site after changes take effect constitutes your acceptance of the revised policy.

This policy complies with the ADGM Data Protection Regulations 2021. For further queries, please contact us at: contact@fareyallp.com