

# CUSTOMER DATA PROTECTION POLICY AND PRIVACY NOTICE

Pixcom Energy LLC meets the requirements of all applicable data protection laws, including the UAE Personal Data Protection Law (PDPL) and other relevant international regulations (such as the GDPR where applicable).

We are committed to handling personal data appropriately, securely and in accordance with relevant legal requirements

## Policy

As a specialist technology company in design, supply, and installation of IT/OT and Telecommunications system for Utility, Energy, and Smart City business customers (working directly or via main contractors), Pixcom Energy LLC does not routinely process personal data on behalf of our customers. However, in certain instances, we may be required to do so as a secondary aspect of our services. This occurs when we are specifically instructed by a customer, such as when configuring customer environments or managing network access permissions.

Whenever Pixcom Energy LLC processes personal data on behalf of a customer, we commit to the following:

- Ensuring the secure processing of personal data, safeguarding it against unauthorized access, unlawful processing, accidental loss, damage, or destruction through robust technical and organizational measures.
- Maintaining accurate and up-to-date records of all processing activities under our responsibility.
- Obtaining explicit prior authorization from the customer before engaging any third-party sub-processors.
- Providing the customer with necessary information upon request and cooperating fully with any audits or inspections conducted by the customer or an appointed auditor.
- Promptly notifying the customer if, in our professional opinion, an instruction violates applicable data protection regulations.
- Alerting the customer without undue delay upon the discovery of any personal data breach.

## Pixcom Energy LLC as Data Controller

Abu Dhabi  
Office 33, 6th Floor, Liwa Street,  
Dar Al Salam - Building, - Corniche St  
Abu Dhabi - UAE  
P.O Box – 25158

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Pixcom Building,  
C06, IMPZ, Dubai Production City  
Dubai – UAE  
P.O Box – 252173

Oxford  
Building 173,  
Harwell Science and Innovation  
Campus, Didcot, Oxfordshire

E: [support@pixcomenergy.com](mailto:support@pixcomenergy.com)  
T: +971 (0) 4 580 6222  
<https://www.pixcomenergy.com>

In scenarios where Pixcom Energy LLC acts as the data controller, we assume full responsibility for ensuring that personal data is processed strictly in accordance with applicable data protection laws.

### Details of Data Controller

Pixcom Energy LLC  
Office 33, 6th Floor, Liwa Street, Dar Al Salam - Building,  
Corniche St - Al Danah - Zone 1  
Abu Dhabi - UAE

Email: [dataprotection@pixcomenergy.com](mailto:dataprotection@pixcomenergy.com)

### Information We May Collect from You

We may collect the professional contact details of our customers and contractors staff members (such as names, email addresses, business phone numbers, and job titles) directly from the customer. Processing this information is within our legitimate business interests to ensure smooth operational workflows and to fulfil our contractual obligations. This data may be hosted by Pixcom Energy LLC or a designated third party on our behalf.

### Your Rights

Under relevant data protection laws, you possess several rights regarding your personal data, including:

- **Right of Access:** You may request copies of the personal information we hold about you.
- **Right to Rectification:** You may request that we correct any information you believe is inaccurate or complete information you believe is incomplete.
- **Right to Erasure:** You can request the deletion of your personal data under certain conditions.
- **Right to Restriction:** You may ask us to restrict the processing of your personal data under specific circumstances.
- **Right to Object:** You have the right to object to the processing of your personal information under certain conditions.
- **Right to Data Portability:** You may request that we transfer the data we have collected to another organization, or directly to you, under specific conditions.

To make a request or raise concerns regarding how we handle your data, please contact us initially at [dataprotection@pixcomenergy.com](mailto:dataprotection@pixcomenergy.com). You also retain

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the right to lodge a complaint with the relevant data protection regulatory authority (such as the UAE Data Office).

### Privacy by Design

When engineering or deploying solutions for our clients, Pixcom Energy LLC strives to integrate appropriate technical and organizational measures. This ensures that privacy principles are embedded into our designs to effectively protect individual rights. We aim to strictly minimize the access, use, storage, and disclosure of personal data wherever feasible, unless instructed otherwise by the customer.

### Security

Pixcom Energy LLC is committed to maintaining high security standards. We are currently undergoing ISO27001 certification and our Cyber Essentials certification is underway.

Oversight is maintained by our Chief Data and Network Security Officer, supported by our security teams. All company hardware, including laptops, is appropriately secured and encrypted, and our infrastructure is subject to protective monitoring and corporate group policies.

### Data Storage

Pixcom Energy LLC utilizes secure Amazon (AWS) data storage technology servers based in the UAE and Europe. Unless otherwise specified by a customer, personal data will be housed in these regions. We only store information for as long as is strictly necessary for its intended purpose and generally do not retain data or documents for longer than 7 years.

### Responsibilities

The Chief Data and Network Security Officer, supported by the Senior Management Team, holds overall responsibility for ensuring that this policy is effectively implemented across the Pixcom Energy LLC business operations.

Managers are responsible for ensuring that activities within their specific areas comply with this policy and its supporting documentation. All staff, including permanent employees, contractors, and temporary workers, are required to adhere strictly to these guidelines.

### Review

This policy, along with Pixcom Energy LLC's performance in fulfilling its requirements, will be monitored continuously and formally reviewed at least annually.

Ahmed Naseef



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Chief Data and Network Security Officer  
Next Review: 01-Jan-2027 – Issue 2  
Date: 01-Jan-2026

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