



Privacy Policy

Classification: **Public**

Public

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1. Privacy Policy

Protecting your privacy and securing your Personally Identifiable Information (“PII”) is our top priority. At Solidarity First Insurance (“SJ”), we are committed to treating the Personal Data you share with us as strictly private and confidential. We implement the most reasonable security standards and process your information in compliance with Jordanian Law No. 24 of 2023 – the Personal Data Protection Law (“the Law”).

This Privacy Policy outlines how we collect, use, disclose, and protect personal data, as well as your data privacy rights and how you can exercise them.

2. Scope

This policy applies to the Personally Identifiable Information collected, processed, and stored by “SJ” through our website, services, and interactions with other third parties (Including but not limited to: clients, partners, service providers, and stakeholders). To have a reasonable assurance about the compliance with Jordan Personal Data Protection Law (“the Law”).

3. Personal Data We Collect and Process

We may collect and process the following types of personal data:

- **Personal Data:** full name (Arabic and English), gender, nationality, weight, height, education certificates, marital status, source of wealth, job position, job/business sector, PIP status, social security number.
- **Contact Data:** Address, phone number, email, and other contact details.
- **Financial Data:** Payment details, bank account information, and transaction history.
- **Insurance Data:** Policy details, claims history, and risk assessments.
- **Technical Data:** IP address, browser type, device information, and website usage data.
- **Customer history:** medical history, recording of customer requests
- **Application data or contract data:** application number, application quotes, application decision, contract number, duration, type of contract.
- **Communication Data:** Customer inquiries, feedback, and recorded customer service interactions.

4. How do we collect your data

We collect your personal data through the following methods:

1. Direct Collection:

When you provide data to us directly, such as by filling out physical or electronic forms, communicating with us by email, or using our digital services and applications.

2. Indirect Collection

When data is gathered indirectly through your interaction with our websites or digital channels, including the use of cookies, automatic collection of technical and browsing information, analytics tools, or system interconnections with other entities.

3. Third-Party Collection

When data about you is provided by third parties, such as your employer, a family member, a legal representative, a contracting party, representatives of legal entities, beneficial owners, or property owners.

4. Publicly Available Sources

When we collect information from sources that are publicly available

Obtaining Consents from Data Subjects

In compliance with the Jordanian Personal Data Protection Law No. 24 of 2023, we implement the following procedures to ensure that **prior, informed, and explicit consent** is obtained from you before collecting or processing your personal data. We also provide mechanisms for withdrawal of consent and clarify our process if consent is not granted.

1. Obtaining Consent

- Consent is requested explicitly via:
 - Digital checkboxes (not pre-checked)
 - Signed paper or electronic forms
 - Verbal confirmation documented and recorded (where applicable)

2. Consent Withdrawal Process

You have the right to withdraw your consent at any time, through any of the following methods:

- By emailing: privacy@solidarity.com.jo
- By submitting a request through <https://www.solidarity.com.jo>
- By contacting our Data Protection Officer (**DPO**) via phone or in-person request
 - Name** : Raed Shraim
 - Phone number** : +962 6 5777 555 / extension 105
 - E-mail** : r.shraim@solidarity.com.jo
- Upon receiving a withdrawal request, we will:
 - Stop processing your personal data (unless legally required to retain it)
 - Acknowledge receipt of the request and confirm actions taken
- In case processing is essential for delivering a service, you may be informed of the consequences.

3. If you decline to provide consent, we will respect your choice and not collect or process your personal data unless there is an exemption under PDPL or any regulation applies.

Additionally, we will inform you of the implications of not providing your data.

4. Data Subjects without legal capability

In order to protect the rights of data subjects who are not legally capable of providing valid consent, SJ requires consent from the data subject's legal representative, **which will be provided in written or digital form; additionally, SJ will require:**

- A valid national ID or family book
- Guardianship documentation issued by a competent authority
- Power of attorney (if applicable)

A data subject is considered not legally capable if they:

- Are under the legal age of majority (under 18 years old).
- Have been placed under legal guardianship by a competent court.
- Are unable to make informed decisions due to medical, psychological, or legal conditions, as defined by law.

5. Documentation and Audit

All consent records and withdrawal requests are:

- Time-stamped
- Securely stored in our internal systems
- Available for audit and regulatory inspection

5. Data Controller and Processor Information

SJ acts as both the Data Controller and, in some cases, the Data Processor of personal data collected through our services.

6. Data Controller and Internal Processor

In most cases, SJ determines the purposes and means of processing your personal data and processes this data internally.

Entity Name: Solidarity Jordan

Address: Amman - King Abdullah II Street, Building No. 95

Email: privacy@solidarity.com.jo

Phone: +962 6 5777555

Data Protection Officer: Raed Shraim, Phone number: +962 6 5777 555 /ext. 105

7. Use of Third-Party Processors

In certain situations, we engage third-party service providers to process data on our behalf. These third parties act as **Data Processors** under contractual obligations to ensure the security and confidentiality of your personal data, and they only process data in accordance with our instructions.

A full list of our third-party processors is available upon request.

8. Why we collect your Personal Data

We collect and process personal data for the following purposes:

- Providing and managing insurance policies and services.
- Processing claims, payments, and customer requests.
- To fulfill our regulatory compliance and reporting obligations
- Improving our services and customer experience.
- Detecting, preventing, and investigating fraud or security threats.
- To share your Personal Data with our service providers, partners, and external auditors.
- To improve our services and understand your needs, we may use profiling to assess, test, and analyze your data for statistical purposes, market research purposes, legal obligations, and contractual necessity.

9. Legal Basis for Processing

We handle your Personal Data only with your written consent, unless the processing is required to comply with applicable regulations or is necessary to fulfill a legal obligation or justified by a legitimate business interest, in accordance with the provisions of the Jordan Personal Data Protection Law (PDPL), and as part of our operations at ("SJ").

10. Data Sharing and Disclosure

We do not sell or rent personal data. However, we may share data with:

- **Regulatory Authorities:** As required by law or regulatory obligations.
- **Business Partners & Service Providers:** For policy administration, payment processing, and customer support.
- **Third-Party Auditors & Security Consultants:** To ensure compliance with **Jordanian PDPL and any other applicable laws, regulations and standards.**

11. Data Security & Protection

We implement technical and organizational measures to ensure the security and confidentiality of personal data, including:

- Encryption and secure data storage mechanisms.
- Access control and role-based permissions.
- Regular security audits and compliance checks.
- Incident response and data breach notification procedures.

If you are using any of our online services, you are responsible for maintaining the confidentiality of your account credentials (i.e. username, password, one time password “OTP”).

12. Data Storage and Retention

SJ will clearly indicate the methods and locations (countries) of storing PII, the applicable retention periods, and the mechanisms for secure destruction or anonymization once the purpose has ended or the retention period expires. Personal data will be retained only as long as necessary for the purposes outlined in this policy or as required by law, in compliance with the Privacy Information Management System (ISO/IEC 27701) and the Jordanian Personal Data Protection Law.

PII Data are stored inside Jordan

13. Your Rights Under the Jordanian Personal Data Protection Law (“the Law”)

SJ explicitly states the rights of data subjects and the available means to respond to their requests or inquiries. If a request cannot be fulfilled due to conflicts with applicable legislation, regulatory requirements, due diligence obligations, or security considerations, SJ will transparently disclose the reason

Under the Jordanian Personal Data Protection Law (“the Law”), you have the following rights regarding your personal data:

- Right to access your personal data.
- Right to rectify, modify, or update your personal data.
- Right to erase your personal data where applicable.
- Right to limit how we process your data.
- Right to obtain a copy of your data in a structured format.

- Right to object to data processing if they are not necessary to achieve or exceed the intended purposes for which the personal Data was collected, or if they are discriminatory, unfair, or unlawful.
- Right to transfer a copy of your data from one controller to another.
- Right to withdraw consent, where processing is based on consent, you can withdraw it at any time.
- Right to file a complaint if you believe your rights are violated.
- Being notified of any data breach or violation regarding the security and integrity of your data. To exercise these rights, please contact us using the details below.

15. International Data Transfers

We may share your personal data with third-party organizations located outside the Hashemite Kingdom of Jordan when there is a legitimate business need. All parties involved are obligated to protect your personal data in line with our contractual agreements.

16. Cookies & Tracking Technologies

Our website uses cookies and similar technologies to enhance user experience. For more details, please refer to our Cookie Policy.

17. Policy Updates

We reserve the right to modify this policy. Any updates will take effect immediately upon being posted on our website.

18. Data Protection Officer (DPO) Information.

DPO name: Raed Shraim

Mobile number +962 79 5661 608

19. Contact Details

If you have questions or concerns or would like to complain, you may reach us at:

Phone: +962 6 5777555

Address: Amman - King Abdullah II Street, Building No. 95

Email: privacy@solidarity.com.jo