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- (xv) YOU ACKNOWLEDGE THAT NO ASSESSMENT HAS BEEN MADE AS TO YOUR ELIGIBILITY AND WHETHER OR NOT THE APPLICABLE INFORMATION IS SUITABLE TO YOU.
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ARQAAM CAPITAL PRIVACY POLICY

Last Updated: September 2023

I. INTRODUCTION:

This Privacy Policy describes the personal data that we collect through our website located at www.arqaamcapital.com (the "Site") and how we use that information.

II. INFORMATION THAT WE COLLECT ON THIS SITE:

Arqaam Capital collects two types of information about users of our Site:

(1) Personally identifiable information: You might disclose this kind of information to us - e.g. as specified below - by registering through this Site, and for our research newsletters and other services. We use such personally identifiable information to respond to your inquiries.

(2) Non-personally identifiable information: We may use cookies to collect non-personally identifiable information in connection with the Site. Our web pages may incorporate technology that allow us or our agents to track the actions of users of our Site. This information is used to help us improve our Site and the services that we provide through our Site.

Personally identifiable information or Personal data includes information that we collect and process about you depending on the products or services you obtain or receive from us. Typically, we process the following information:

You provide us with the following categories of information and personal data about yourself (which you must keep us promptly informed of any changes to and/or any updates to, such as any new addresses or IDs):

- Personal details: title, name, previous names, nationality, photograph, gender, date and place of birth.
- Contact: email address, residential or business address and contact telephone number.
- Identity: Emirates ID number, passport and similar documentation.
- Identity verification data: for our electronic services. we require at least two forms of evidence to verify your identity which may include: your registered mobile number, registered email address, utility bills and other proof of residential address, recording of your voice and a video call.
- Financial information: your bank account number, statement of account, credit or debit card numbers, financial history, credit score and authentication-related information.

- Economic, financial and residency information: income and other revenues, the value of your assets and your country of residence.
- Education and Employment related data: level of education, employment, employer's name and remuneration.
- Transactions: details about payments to and from your accounts including repayments of any loan or credit facilities, beneficiary names, account numbers, addresses and transaction details.
- Log-in: information in connection with our account sign-in facilities, including your log-in, username and encrypted password details.
- Correspondence: information you give to us by filling in any of our forms or by communicating with us, whether face-to-face, by phone (including recorded phone lines), email, online or otherwise.
- Marketing: details of any marketing preferences we receive from you.
- Video and voice protection (including CCTV and recorded telephone lines): surveillance of our premises and telephone lines, for regulatory and for security reasons.

We currently do not collect any sensitive information, as defined by the regulations.

III. IN RELATION TO YOUR USE OF THIS SITE:

We automatically collect the following when you use our website or our relevant applications:

- **Location data**, with your approval, used with our regulated applications, and so that we can deliver content, advertising and other services that are dependent on knowing where you are. Location data may be collected in combination with your device ID so that we can recognise your mobile browser or device.
- **Technical information**, such as your IP address and device ID; mobile number; Internet protocol address; login information; browser type and version; browser plug-in types and versions; Device IDs; Google ID; time zone setting; operating system and platform; hardware version; device settings (like language and time zone); file & software names and types; and your mobile operator or ISP.
- **Information about your visit**, such as your URL and website interaction; full Uniform Resource Locators; clickstream to, through and from our site (including date and time); page response times & download errors; page interaction information (such as scrolling, clicks, frequency and length of visits, types of content viewed or engaged with, and mouse-overs); and methods used to browse away from the page.
- **Networks and connections**, when you interact with us and the people and groups that you are connected to (for example, through social media or communication).
- **Telephone and Social Media Recordings**: We may also collect, for regulatory purposes, any phone number you use to call our offices and staff members (including call metadata such as the

date, time and length of a call) or the social media handle you use to connect with our customer service team. We may record calls for training and performance purposes to establish clear records and for legal reasons.

See our Cookie Policy below for more information on our use of cookies and device identifiers.

IV. WE ALSO COLLECT INFORMATION ABOUT YOU FROM THE FOLLOWING SOURCES:

- Other Arqaam Group of companies entities;
- Credit Information Agencies and fraud prevention agencies;
- People appointed to act on your behalf;
- Third party providers and partners to help us improve the personal data we hold and to provide more relevant and interesting products and services to you;
- Other financial institutions with whom you transact through;
- Joint account holders;
- Our co-branded financial services product partners for example, our white labelled financial services products;
- Criminal record checks from organisations authorised to provide this data;
- Debt recovery agents;
- Advertisers and social media partners may share technical information and information about your visits with them including your experiences or interactions with them;
- Databases made available by official authorities and government authorised sources to update/verify your documents; and
- Publicly available sources.

V. CONFIDENTIALITY OF PERSONAL DATA

When we collect personal data, we provide a safe, secure and confidential environment in all of our delivery Channels to ensure that your personal data remains private and used for the purposes for which it is held. We have a legal obligation to keep your data confidential, except in circumstances where the disclosure of your data is imposed by a legal authority or regulatory body; or in circumstances where the disclosure is made with your express consent or through a representative nominated by you.

VI. COLLECTING PERSONAL DATA

- We collect data directly from you as our customer or prospective customer. In certain circumstances we may collect information from you about individuals who do not have a direct relationship with us.

- This may happen, for instance, when you provide us with information about: Representative(s) of a corporate client; Shareholder(s)/Director(s) of a corporate client; Legal representatives (power of attorney) of a client; Ultimate beneficial owners; Successors and right holders; Co-borrowers / guarantors; Beneficiaries of your payment transactions; Landlords; and Reference contacts provided in the application form by our (prospective) customer.
- When you provide us with third party personal data (included but not limited to those listed above) you are responsible for ensuring that such third party has received this Privacy Notice and understands how we will use their personal data.

VII. WHY WE USE PERSONAL DATA

- We need your personal data to provide you with the services or products requested by you.
- After you submit an application form with us or become our customer, we have certain legal obligations to process your data. If you do not provide us with the requested personal data, we will be unable to comply with the legal or regulatory obligations and will not be able to offer our services to you.
- It is voluntary for you to provide us your data or consent for sales or marketing purposes.

VIII. WHAT IT IS YOUR DATA USED FOR

For Contractual Purposes:

- To create your Arqaam Capital securities account.
- To identify you when you contact us, instruct us and/or sign-in to your account, as applicable.
- To provide you with our services, and to fulfil your requests for certain products and services.
- To tell you about important updates and changes to our channels, including to our Privacy Notice, Data Protection Policy and other policies and terms.

For Legitimate interests:

- To contact you if you have asked us to do so including to resolve troubleshooting problems and helping with any issues concerning our website or apps.
- To contact you for your opinions about our services including through surveys and other market research.
- To prevent and detect fraud, money laundering and other crimes (such as identity theft).
- To establish, exercise or defend our legal rights or those of any other member of our Group.

For Legal obligations:

- To recover debt and exercise other rights we have under any agreement with you as well as to protect ourselves against harm to our rights and interests in property.

- To comply with laws and regulations that apply to us and to co-operate with regulators and law enforcement organisations.

Consent

- To understand how you use and interact with our services and the people or things you're connected to and interested in.
- To personalise the marketing messages we send to you so that they are more relevant and interesting.
- To enhance your consumer experience, we may share your personal data for direct marketing purposes.
- To administer and improve the design and functionality of our applications for a better customer experience.
- To conduct profiling and automated decision-making to help us provide you with relevant information, suggestions and recommendations for products.
- When we advertise our products and services on the internet, we may share your information with our advertising partners where we think you may be interested in our offers.
- When we use social media for marketing purposes your information will be shared with any such platforms so that they can check if you hold an account with them. They may use your information to send our advertisements to you.

IX. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA:

Consent: We will use your personal data to send you promotional or marketing materials if you have given consent to us doing so where required by law. We also rely on consent for some of the cookies we use. You can opt-out of further marketing at any time by changing your marketing preferences in your account.

Contract: We collect, store and process your personal data if it is necessary for performing a contract you have with us or where you have asked us to take specific steps before entering into that contract.

Legal Obligation: We may need to process your personal data to comply with our legal obligations, including under applicable DIFC, UAE, UK, EU and local law (including data protection law), and/or any court orders.

Legitimate interests: processing your personal data is sometimes necessary for us to undertake the activities detailed below, in our own interest or sometimes in the interests of a third party (like our rewards programme partners).

Our legitimate interests are: Making sure our customer accounts are operational; Delivering, developing and improving our products and services; Business growth and marketing strategies;

legal and compliance reasons, such as AML, fraud and criminal activity checks; record keeping and keeping our regulatory records up-to-date; Improving our website and applications from a security perspective; Enforcing or applying our terms or other agreements with you, including recovering securities, fees or other debts and obligations due to us; and Giving you information about our products and services that you may be interested in and, in the case of electronic marketing, where we have your permission to do so.

X. HOW WE USE THE INFORMATION WE GATHER

- Generally, we will not disclose personally identifiable information that we collect through your use of the Site to unaffiliated third parties.
- We reserve the right, however, to provide such information to our employees, contractors, agents, and designees to the extent necessary to enable them to perform certain Site-related services.
- We also reserve the right to disclose such information to any third party if we believe that we are required to do so for any or all of the following reasons: (i) by law; (ii) to comply with legal processes, regulatory or governmental requests; (iii) to prevent, investigate, detect, or prosecute criminal offences or attacks on the technical integrity of the Site or our network; and/or (iv) to protect the rights, property, or safety of Arqaam Capital and its affiliates, their partners, and employees, the users of the Site, or the public.

Automated processing: The way we analyse personal data relating to our services may involve profiling or other automated methods to make decisions about you that relate to the following:

- Anti-money laundering, sanctions checks and screening 'politically exposed' people.
- Monitoring your account for fraud and other financial crime – we will assess your transactions to identify any that are unusual.
- Assessments required by regulators and appropriate authorities – certain details in your information may suggest that you are likely to become financially vulnerable and we may need to help you.
- You may have a right to certain information about how we make these decisions. You may also have a right to request human intervention and to challenge the decision
- In some instances, Credit and affordability checks (including credit limits) – we will consider a number of factors including information about your income, expenses and how well you have kept up on payments in the past.

XI. WE MAY SHARE YOUR PERSONAL DATA WITH:

- companies within the Arqaam Capital Group of Companies and affiliates who may support us in any of the purposes set out in this Privacy Notice;

- any joint account holders, guarantors, trustees or beneficiaries;
- anyone who provides instructions or operates any of your accounts on your behalf including advisers (such as solicitors and accountants), intermediaries and those under power of attorney;
- people you make payments to and receive payments from;
- providers of payment-processing services and other businesses that help us process your payments;
- government-authorised Credit Information Agencies and fraud prevention agencies to comply with our legal and regulatory obligations. Please be advised about the possible limitations of accessing future financial products and/or services based on your records provided to these agencies;
- any fund managers who provide asset management services to you and any brokers who introduce you to us or deal with us for you;
- independent third-party service providers and agents (including their sub-contractors) such as collection agents or providers who may deliver a gift or provide a gesture of goodwill;
- our business partners, together with whom we provide services such as hotels, restaurants, airline partners (whose logo may appear on a credit card we provide) and service providers or agents who provide services on their behalf;
- insurance providers, including underwriters, brokers and associated parties;
- analytics providers that assist us in the optimisation of our website and apps including by measuring the performance of our online campaigns and analysing visitor activity;
- social media companies so they can display messages to you about our products and services or make sure you do not get irrelevant messages;
- any people or companies where required in connection with potential or actual corporate restructuring, merger, acquisition or takeover including the transfer of any of our rights or duties under our agreement with you;
- law enforcement authorities, government bodies, regulators, courts, dispute resolution bodies, regulators, auditors and any party appointed by our regulators to carry out investigations or audits of our activities; and
- where required to do so by court order or where we are under a duty to disclose or share your information in order to comply with (and/or where we believe we are under a duty to comply with) any legal obligation.

The disclosure of personal data to these parties is done with the utmost care and due diligence to ensure that the protection and privacy of your data is maintained.

XII. WHERE WE STORE YOUR DATA

We are headquartered in the Dubai International Financial Services in the United Arab Emirates



(UAE). We may transfer your personal data within the United Arab Emirates and to other countries where we (or other companies within the Arqaam Group of Companies operate) or our service providers maintain operations.

When we do this, we'll ensure it has an appropriate level of protection and that the transfer is lawful. This includes relying on adequacy decisions issued by the relevant data protection authority and using standard contractual clauses for transfers of personal data. You can obtain more details of the protection given to your information when it is transferred by contacting us using the details below.

XIII. HOW LONG WE KEEP YOUR DATA

We do not keep your personal data for any period longer than is necessary for the purpose for which your personal data was collected, processed, required by law or where we may need it for our legitimate purposes such as maintaining records for analysis or audit purposes, regulatory purposes, responding to queries or complaints, monitoring fraud, defending or taking legal action and responding to requests from regulators.

If you opt out from receiving marketing communications or object to any other processing of your personal data, we may keep a record of your objection to ensure that we continue to respect your wishes and do not contact you further.

XIV. CHANGING OR DELETING PERSONAL INFORMATION

If you would like to change your personal information, or if you no longer wish to receive materials from us or want your personal information removed from Arqaam Capital's database, please contact our appointed Data Protection Officer at: dataprotection@arqaamcapital.com.

XV. SECURITY

Arqaam Capital seeks to adopt commercially reasonable security measures to assist in protecting against the loss, misuse, and alteration of personally identifiable information which is under our control. Unfortunately, no security system, or system of transmitting data over the Internet, can ever be guaranteed to be 100% secure. As a result of the foregoing, while we undertake commercially reasonable efforts to protect your personally identifiable information, we cannot guarantee the security of our servers, the means by which information is transmitted between your computer and Arqaam Capital's servers, or any information provided to us or to any third party through or in connection with the Site. You provide all such information entirely at your own risk.

XVI. YOUR RIGHTS TO YOUR DATA

In certain circumstances, you have the right to:

- ask for a copy of the personal data we hold about you and obtain information about how we process it;
- ask us to give you (or a third party chosen by you) an electronic copy of the personal data you have given us;
- ask us to correct personal data we hold;
- ask us to restrict how we use your personal data;
- ask us to delete your personal data;
- object to particular ways we are using your personal data, including objections to marketing;
- contact us with any enquiries or complaints in respect of your personal data; and
- withdraw consent to the following at any time:
 - the processing of your personal data by us except where your personal data is required for business operation in relation to the product or service you obtain from us; and
 - sharing your personal data with third parties for purposes such as but not limited to marketing or sales.

Please note that a withdrawal of consent by you will not affect the lawfulness of data processing based on the prior consent. Your withdrawal of consent will take effect within 30 calendar days from the day you request us to do so.

If you wish to exercise any of these rights in relation to the personal data we hold about you or wish to change your preferences at any time, please contact us, using the details below.

We will ask you to verify your identity before allowing you to access your personal data.

(VII. REVISIONS TO PRIVACY POLICY

Arqaam Capital reserves the right to update and revise this Privacy Policy at any time. Your use of our Site and our services and applications constitute your acceptance of the terms of the Privacy Policy as amended or revised by us, and you should therefore review this Privacy Policy regularly to ensure that you are aware of its terms.

VIII. LINKS TO OTHER SITES

If our Site or documentation contains links to other websites, please be aware that we are not and cannot be responsible for the privacy practices of such other websites and that this Privacy Policy applies solely to the information which we collect through this Site. We encourage you to ensure that you read the privacy statements of all the destination websites which you visit.



XIX. ARQAAM CAPITAL COOKIE POLICY

Cookies: Cookies are small pieces of encrypted text saved in your web browser by a website you visit. Encrypted text can on be read by the website it was saved by. A cookie file is stored in your web browser and allows the Arqaamcapital.com or a third-party to recognize you and make your next visit easier and the Arqaamcapital.com more useful to you. Cookies can be "persistent" or "session" cookies.

How Arqaamcapital.com and its affiliate sites uses cookies: When you use and access the Arqaam Capital.com, we may place a number of cookies files in your web browser.

We use cookies for the following purposes: to enable certain functions of the Arqaam Capital.com, to provide analytics, to store your preferences, to enable advertisements delivery, including behavioral advertising.

Session and Persistent Cookies: Arqaam Capital may also use both session and persistent cookies on the Arqaamcapital.com and its affiliate websites, and Arqaam Capital uses different types of cookies to run the Arqaamcapital.com

Essential cookies: Arqaam Capital may use essential cookies to authenticate users and prevent fraudulent use of user accounts.

Sharing Cookie Data: Arqaam Capital may share any information and data with third parties based on your permission obtained for receiving information on special offers by using this site and you hereby explicitly agree to the collection and use of the said data by Arqaam Capital for the purpose described above.

Arqaam Capital and or third parties may use such information or data to identify you on social media platforms in order to provide you with the latest products, offers or incentives offered by Arqaam Capital or such third parties.

Third-party cookies: In addition to our own cookies, we may also use various third-parties cookies to report usage statistics of the Arqaamcapital.com, deliver advertisements on and through the Arqaamcapital.com, and so on.

What are your choices regarding cookies: If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.



Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

In each case we balance our legitimate interests with your rights and interests. If you would like further information about how we assess our legitimate interests, please contact us at: dataprotection@arqaamcapital.com

XX. CONTACT

Data Protection Officer at Arqaam Capital: dataprotection@arqaamcapital.com

Write to:

C/O Data Protection Officer

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