

PhillipCapital (DIFC) Private Limited Privacy Notice

It is our policy to respect the confidentiality of information and the privacy of individuals. Our Privacy Notice describes how PhillipCapital (DIFC) Private Limited handles the collection, management and protection of all confidential user information about our clients, potential clients, and others.

This notice applies to PhillipCapital (DIFC) Private Limited with its registered office at Liberty House, 417, Level 4, DIFC, Dubai, UAE.

In this notice 'us', 'our', 'we' or 'PhillipCapital' is a reference to PhillipCapital (DIFC) Private Limited. Similarly, 'you', 'your', 'yours' or 'yourself' is a reference to any of our clients, potential clients, and others.

We are committed to being open and transparent about how we use personal information. When we you ask for personal information, we will generally state the purposes for its use and to whom it may be disclosed. We are bound by the DFSA rules, regulations and DIFC Data Protection Law, DIFC Law No. 5 of 2020.

Our privacy notice will be reviewed from time to time to take account of new laws and technologies, changes to our operations and practices and to make sure it remains appropriate to the changing environment.

By accessing our websites, including using any of the communication channels to contact us, we consider that you have read and understood the terms of this notice and how we process any information you disclose to us including personal data before becoming a client. Once you open an account with us you agree that this notice, including any amendments, will govern how we collect, store, use, share and process your personal data and your rights during our business relationship and after its termination.

Because of the nature of the products and services provided, regulations and other applicable laws we are subject to, we ask for a range of personal information from our clients. The type of personal information we may collect can include (but is not limited to) name, proof of identity, proof of address, date of birth, gender, contact details, income, assets and liabilities, trading statements, financial statements, credit reporting information, employment details, location data, knowledge and experience in trading, risk tolerance and risk profile .

We are required by regulations to identify you if you are opening a new account or adding a new signatory to an existing account. Anti-money laundering laws require us to sight and record details of certain documents. Identification documentation, as required under anti-money laundering legislation or other legislation relevant to the services we provide to you includes:

- a) Passport or any other photo identity card issued by government;
- b) national identity card (if applicable);
- c) utility bills;
- d) any other information we consider necessary.

If you are a non-individual client we are required to collect additional information include (not limited to) corporate documents of address, shareholders, and directors, officers including additional personal information on the Shareholders, Directors and Authorized signatories and trust deed (if applicable). We have the right to ask any additional information we deem necessary to be compliant with our legal and regulatory requirements.

We obtain this information in a number of ways - through your use of our websites, the account opening applications, online sign up forms, and similar technologies in our websites or apps.

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you. These recordings will be our sole property and will constitute evidence of the communications between us. Such telephone conversations may be recorded without the use of a warning tone or any other notice.

Further, if you visit any of our offices or premises, we may have CCTV which will record your image.

As part of using your personal information for the purposes set out above, we may disclose your information to:

- other companies within the PhillipCapital group who provide financial and other services;
- third party apps providers when you use their apps through us, communication systems and trading platforms which are provided to us by third parties;
- Payment service providers and banks processing your transactions;
- auditors (internal and/or external)
- Courts and applicable regulatory authorities as agreed or authorized by law or our agreement with you
- government bodies and law enforcement agencies where required by law and in response to other legal and regulatory requests;
- Any third-party where such disclosure is required in order to enforce or apply our Terms and Conditions of Service or other relevant agreements;
- Anyone authorized by you include (not limited to) stock and derivatives exchanges.

We endeavor to disclose to these third parties only the minimum personal data that is required to perform their contractual obligations to us. Our third-party service providers are not permitted to share or use personal data we make available to them for any other purpose than to provide services to us.

Our websites or apps may have links to external third-party websites. Please note that third party websites are not covered by this privacy notice.

When and how do we obtain your consent?

We may process your personal data for one or more lawful basis of processing (“Lawful Basis”) depending on the specific purpose for which we are using your data.

The Lawful basis are the following:

- Processing is necessary for the performance of a contract to which you are a party, or in order to take steps at the request of you prior to entering into such contract;
- Processing is necessary for compliance with Applicable Law we are subject to;
- to pursue our legitimate interests
- and as per other general requirements explained in DIFC Data Protection Law(as amended)

Where our use of your personal information does not fall under one of these Lawful basis we require your consent. Such consent shall be freely given by you and you have the right to withdraw your consent at any time by contacting us using the contact details set out in this privacy notice.

We may use personal data provided by you through our website or otherwise and personal data provided during our business relationship to communicate with you for marketing promotional purposes as well as to provide you with market news and analytical reports. The channels used for such communications may include calling you, sending emails, notifications through your online account portal and SMS notifications. You have the right to opt out by sending an email to cdp@phillipcapitaldifc.ae using the registered email address you disclosed to us. Where you have opted out of receiving marketing communications we ensure you do not receive such communications.

Management of personal information

We are committed to safeguarding and protecting personal data. We have appropriate technical and organizational measures to ensure a level of security appropriate to protect any personal data provided to us from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or processed. We have necessary arrangements to ensure that our management of personal information is in accordance with this privacy notice and the applicable regulations.

We require organizations outside the PhillipCapital who obtain personal information acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with this privacy notice.

In brief, the data protection measures we have in place are the following:

- we train our employees who handle personal information to respect the confidentiality of client information and the privacy of individuals;
- requiring our employees to use passwords and have proper authentication when accessing our systems;
- we ensure employees only have access to the personal data required for the purposes of the tasks they handle;
- virus scanning tools to protect from unauthorized persons and viruses entering our systems;
- clean desk policy in our premises and providing secure storage for physical records; and
- physical and electronic means to protect against unauthorized access.

How do we store and how long we keep your information

We hold personal information in a combination of electronic and paper files .We take steps to protect the personal information we hold from misuse, loss, unauthorized access, modification or disclosure.

We keep your information only so long as we need it to provide services to you, fulfill the purposes described in this notice subject to applicable regulations. This is also the case for anyone with whom we share your information and who carries out services on our behalf. When we consider that personal information is no longer needed, we will remove any details that will identify you or we will securely destroy the records or handle it as per applicable regulations.

However, we may need to maintain records for a significant period of time. For example, we are subject to anti-money laundering laws which require us to retain copies and evidence of the actions taken by us in regard to your identity verification, sources of incomes and wealth, monitoring of your transactions, telephone, chat and email communications, orders and trades history, handling of your complaints and records that can demonstrate that we have acted in line with regulations throughout the business relationship with you. These records must

be maintained for a period of six years after our business relationship with you has ended or even longer if we are asked by our regulators.

When we transfer your data to other third parties outside the DIFC, we ensure we comply with applicable regulations.

Your rights

Please note that these rights do not apply in all circumstances. You are entitled:

- to withdraw consent at any time and for any reason;
- to access, rectify or erase Personal Data;
- to object to the Processing of Personal Data at any time on reasonable grounds
- to restrict the processing of personal data
- to receive the details of Personal Data that you have provided
- to object to any decision based solely on automated Processing, including Profiling
- to be informed before Personal Data is disclosed for the first time to third parties or used on their behalf or to object to disclosure to third parties or in relation to direct marketing;
- to lodge a claim, make a complaint and request mediation;
- for portability of your Personal Data between controllers;
- to non-discrimination where you exercises any such rights; and
- to have available at least two (2) methods of contact us to exercise such rights.

You can make personal data request by email using the registered email address you disclosed to us, to the following email address: cdp@phillipcapitaldifc.ae or phone us on +971 (0)4 605 3999 from your registered contact number.

We try to respond to all requests within 1 (one) month. Occasionally, it may take us longer than 1 (one) month if your request is particularly complex or you have made a number of requests. In this case, we will notify you within 1 (one) month of the receipt of your request and keep you updated.

We may charge you a reasonable fee when a request is manifestly unfounded, excessive or repetitive, or we receive a request to provide further copies of the same data. In this case we will send you a fee request which you will have to accept to process your request.

What if you have a query or a complaint?

Please phone us on +971 (0)4 605 3999, or write to us at: PhillipCapital (DIFC) Private Limited , Liberty House , 417 ,Level 4 , DIFC, Dubai, UAE or email: compliance@phillipcapitaldifc.ae

If you are not satisfied with our response to your complaint, you have the right to lodge a complaint with the Commissioner of Data Protection, DIFC.

Our services include products that are traded on margin and carry a risk of losses in excess of your deposited funds. Trading these products may not be suitable for everyone, hence please ensure you fully understand the risks and take care to manage your exposure.