



PRIVACY POLICY

FINALTO FINANCIAL SERVICES MENA LLC • V 1.0

The information contained herein is the property of Finalto Group and its associated entities and may not be copied, used, or disclosed in whole or in part outside of the group of companies without prior written permission.

1 Introduction

Finalto Financial Services MENA LLC (“Finalto MENA”, “the Company”, “we”, “us” or “our”) is committed to protecting your personal data. This Privacy Policy explains how we collect, use, share and protect your personal data when you visit our website, when you enquire about or are introduced by us to a member of the Finalto Group, and when you otherwise interact with us. It also tells you about your privacy rights and how the law protects you.

This Privacy Policy is issued in accordance with Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (the “PDPL” or “Data Protection Law”).

Data Controller: Finalto Financial Services MENA LLC (part of the Finalto Group), Commercial Licence No. 1527841, regulated by the UAE Capital Market Authority (CMA) under Licence No. 20200000364. Registered office: Magnus Opus Tower, Unit 1206, Barsha Heights, TECOM, Dubai, United Arab Emirates.

Our role. Finalto MENA is licensed to carry on promotion and introduction activities only. We act solely as an intermediary to introduce you to a regulated affiliate within the Finalto Group (a “Host Entity”). We do not open trading accounts, hold client money, execute transactions or act as counterparty. The Host Entity to which you are introduced is a separate data controller in respect of your trading account and trading activity, and its own privacy policy will apply to that relationship.

This Privacy Policy covers personal data for which Finalto MENA is the data controller. Where another Finalto Group entity determines the purposes and means of processing your personal data, that entity’s privacy policy will apply.

2 The Personal Data We Collect About You

“Personal data” means any information relating to an identified natural person, or one who can be identified directly or indirectly. It does not include data from which the identity has been permanently removed (anonymous data).

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

We may collect, use, store and transfer the following categories of personal data about you:

- **Identity Data:** first name, last name, username or similar identifier, title, date of birth, nationality, gender, and government identification details (for example, passport or Emirates ID).
- **Contact Data:** residential or business address, email address and telephone numbers.
- **Due Diligence Data:** information and documents collected for “know your customer” (KYC), customer due diligence and verification purposes, including identification documents, details of beneficial owners and directors, and information on source of funds and source of wealth.

- **Screening Data:** the results of sanctions, politically exposed person (PEP) and adverse-media screening carried out for financial-crime compliance.
- **Classification Data:** information used to assess and determine whether you meet the criteria of a Professional Client.
- **Technical Data:** internet protocol (IP) address, login data, browser type and version, time zone and location settings, operating system and platform, and other technology on the devices you use to access our website.
- **Usage Data:** information about how you use our website.
- **Communications Data:** records of your communications with us, including telephone calls and electronic messages, which we may record and retain for monitoring, quality and regulatory purposes.

Information about your trading account, orders and transactions, and any payment-card or bank-account details used for funding, is collected and processed by the relevant Host Entity, not by Finalto MENA, and is governed by the Host Entity's privacy policy.

Aggregated Data. We may collect, use and share aggregated data (such as statistical or demographic data) for any purpose. Aggregated data is not personal data in law, as it does not directly or indirectly reveal your identity.

Sensitive personal data. We do not generally collect special categories of personal data (such as data revealing racial or ethnic origin, religious or philosophical beliefs, health, or genetic or biometric data). To the extent we process data relating to sanctions, criminal allegations or other financial-crime matters, we do so only as necessary to comply with the AML Laws and other Applicable Law.

3 How We Collect Your Personal Data

We use different methods to collect personal data from and about you, including:

- **Directly from you** – when you contact us, enquire about our products or services, register your interest, or provide information during our introduction and due-diligence process.
- **From third parties and public sources** – including:
 - sanctions, PEP and identity-verification screening providers;
 - data brokers or aggregators;
 - publicly available sources and official registers; and
 - analytics and advertising providers (Technical Data) in connection with our website.
- **From the Host Entity** – we may receive information from the Host Entity in connection with your introduction.

Where we are required to collect personal data by law, or need it in order to introduce you to a Host Entity, and you do not provide that data when requested, we may be unable to make the introduction or provide the relevant Services.

4 How We Use Your Personal Data

We will only use your personal data where the Data Protection Law allows. Under the PDPL, processing is generally based on your consent. We may also process your personal data without consent where another lawful basis applies, including where processing is necessary for:

- the performance of a contract to which you are a party, or to take steps at your request before entering into a contract;
- compliance with a legal or regulatory obligation to which we are subject (including the AML Laws);
- the protection of the public interest;
- the protection of your vital interests or those of another person; or
- our legitimate interests, provided these do not conflict with your rights and interests.

We may rely on more than one lawful basis depending on the purpose for which we are using your data. Please contact compliance@finaltomena.com if you need details of the specific basis we rely on.

5 Purposes For Which We Use Your Personal Data

The table below describes the principal ways in which we use your personal data and the lawful bases we rely on under the PDPL.

Purpose / Activity	Type of Data	Lawful basis under the PDPL
Respond to your enquiries and provide information about products and services (promotion)	Identity; Contact; Usage	Consent; legitimate interests
Register your interest and collect information to introduce you to a Host Entity	Identity; Contact; Due Diligence	Steps prior to / performance of a contract; legitimate interests
Carry out customer due diligence, sanctions screening and AML/CTF checks	Identity; Due Diligence; Screening	Compliance with legal/regulatory obligation; public interest
Assess and determine your classification as a Professional Client	Identity; Classification	Compliance with legal/regulatory obligation

Purpose / Activity	Type of Data	Lawful basis under the PDPL
Introduce you to, and share your data with, a Host Entity	Identity; Contact; Due Diligence; Screening	Performance of a contract; consent; legitimate interests
Manage our relationship with you, including notifying you of changes to our terms or this policy	Identity; Contact	Performance of a contract; legal obligation; legitimate interests
Comply with our regulatory obligations and respond to regulators and authorities	All relevant categories	Compliance with legal/regulatory obligation
Administer, protect and improve our website and business, including analytics	Technical; Usage	Legitimate interests; consent (cookies)
Send you marketing communications	Identity; Contact; Usage	Consent

6 Marketing and Promotional Communications

We may use your Identity, Contact, Technical and Usage Data to identify products, services and offers that may be relevant to you (“marketing”).

We will send you marketing communications only where you have consented or where otherwise permitted by Applicable Law. You may withdraw your consent or opt out at any time by emailing compliance@finaltomena.com or the contact set out in Appendix 1.

Third-party marketing. We will obtain your express consent before sharing your personal data with any party outside the Finalto Group for that party’s marketing purposes.

7 Disclosure of Your Personal Data

We may share your personal data with:

- the Host Entity to which you are or may be introduced (a regulated affiliate within the Finalto Group), including the results of due-diligence and sanctions screening;
- other companies in the Finalto Group that provide IT, administration and support services;
- service providers (processors), including sanctions/KYC screening and IT providers;
- professional advisers, including lawyers, auditors, bankers and insurers;
- regulators and other competent authorities, including the CMA, the UAE Financial Intelligence Unit, the UAE Central Bank, and courts or law-enforcement bodies, where required; and
- a buyer or successor in the event of a reorganisation, merger or transfer of our business.

We require all third-party processors to respect the security of your personal data, to act only on our documented instructions under a written data-processing agreement, and not to use your personal data for their own purposes.

8 International Transfers

We share personal data within the Finalto Group and with service providers located outside the UAE, including in jurisdictions such as the United Kingdom, the European Union (including Cyprus), Singapore, Australia and the British Virgin Islands. In particular, the Host Entity to which you are introduced may be located outside the UAE.

We transfer personal data outside the UAE in accordance with the PDPL. Where the destination jurisdiction is recognised as providing an adequate level of protection, we transfer on that basis. Where adequacy is not established, we rely on appropriate safeguards (such as contractual clauses or binding internal rules) or on a permitted exception, including where the transfer is necessary for the performance of the contract between you and the Host Entity, where you have given your explicit consent, or where the transfer is necessary to comply with a legal obligation. Some jurisdictions may not offer the same level of data protection as the UAE.

9 Data Security

We have implemented appropriate technical and organisational measures to protect your personal data against accidental or unlawful loss, access, alteration or disclosure. Access is limited to personnel and third parties who have a business need, and who are subject to a duty of confidentiality.

We have procedures in place to deal with any suspected personal data breach. Where a breach is likely to affect your privacy, security or confidentiality, we will notify the UAE Data Office and, where the breach poses a high risk to your rights, the affected individuals, in accordance with the Data Protection Law.

10 Data Retention

We retain your personal data only for as long as necessary for the purposes for which it was collected, including to satisfy any legal, regulatory, accounting or reporting requirements.

In any event, we retain personal data relating to our relationship with you for a minimum of 5 years following the end of that relationship, or for such longer period as may be required under Applicable Law or for the establishment, exercise or defence of legal claims. Personal data that we are not required to retain for these purposes (for example, marketing preferences) will be deleted or anonymised when it is no longer needed.

11 Your Legal Rights

Subject to the conditions and exceptions set out in the Data Protection Law, you have the right to:

- **be informed** about how we collect and use your personal data;

- **request access** to your personal data;
- **request correction** of personal data that is inaccurate or incomplete;
- **request erasure** of your personal data;
- **request restriction** of the processing of your personal data;
- **object to, or request that we stop**, the processing of your personal data (including for marketing);
- **request data portability** – to receive or have transferred your personal data, where applicable;
- **object to automated decisions** based solely on automated processing, including profiling; and
- **withdraw consent** at any time where we rely on consent (without affecting the lawfulness of processing before withdrawal).

Some of these rights are subject to conditions and may not apply where we are required to retain or continue processing your personal data to comply with a legal obligation (including the AML Laws) or for the establishment, exercise or defence of legal claims.

You will not usually have to pay a fee to exercise your rights. We may charge a reasonable fee, or refuse to act, where a request is manifestly unfounded, excessive or repetitive. We may need to confirm your identity before acting on a request. We will respond as soon as reasonably practicable and within any period prescribed by the Data Protection Law.

12 Cookies

You can set your browser to refuse some or all cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, some parts of our website may become inaccessible or may not function properly. For more information, please see our Cookie Policy.

13 Complaints

You have the right to lodge a complaint with the UAE Data Office, the federal data protection regulator. We would, however, appreciate the opportunity to address your concerns before you approach the regulator; please contact us at compliance@finaltomena.com.

14 Changes to This Privacy Policy

We may update this Privacy Policy from time to time. The current version is published on our website and applies from the date on which it is posted. Where appropriate, we will notify you of material changes.

15 Governing Law

This Privacy Policy is governed by, and construed in accordance with, the laws of the United Arab Emirates, including the PDPL, as applied in the Emirate of Dubai.

16 Glossary – Lawful Bases

Basis	Meaning
Consent	Processing based on your freely given, specific, informed and unambiguous consent, which you may withdraw at any time.
Performance of a contract	Processing necessary to perform a contract to which you are a party, or to take steps at your request before entering into a contract.
Legal or regulatory obligation	Processing necessary to comply with a legal or regulatory obligation to which we are subject, including the AML Laws.
Legitimate interests	The interests of our business in conducting and managing it, provided these do not conflict with your rights and interests.
Public interest	Processing necessary for the performance of a task carried out in the public interest.

17 Glossary - Recipients

- **Host Entity:** a regulated affiliate of the Company within the Finalto Group to whom you are introduced and which provides trading services.
- **Internal Group third parties:** other companies in the Finalto Group (including those based in the United Kingdom, Australia, Singapore, Cyprus, Denmark and the British Virgin Islands) that provide IT, administration and support services.
- **External third parties:** service providers (processors) providing sanctions/KYC screening, IT and administration services; professional advisers (lawyers, auditors, bankers and insurers); and regulators and other competent authorities.

Appendix 1 – Contact Details

Data protection, privacy and compliance enquiries: compliance@finaltomena.com

Address: Magnus Opus Tower, Unit 1206, Barsha Heights, TECOM, Dubai, United Arab Emirates