

Data Privacy Notice

The following Data Privacy Notice (“**Notice**”) gives an overview of our collection and processing of your data.

1. Introduction

We would like to give you an overview of how we will process your personal data and of your rights according to the data privacy laws in the Dubai International Financial Centre (“**DIFC**”). The details on what data will be processed and which method will be used depend significantly on the nature of your business relationship with us and the services applied for or agreed upon.

“**We**”, “**us**” and “**our**” as used in this Notice refers to Entrust Capital Limited the company responsible for data processing.

“**You**” and “**your**” as used in this Notice refers to individuals:

- with whom we come into contact, or in respect of whom we obtain personal data, in the usual course of dealings with our clients, our service providers, and our other business counterparties or transaction participants, which may include, without limitation, employees, directors, officers, beneficial owners and other personnel of such clients, service providers, business counterparties or transaction participants; or
- who themselves are our clients.

“**Data Protection Law**” means the Data Protection Law DIFC No. 5 of 2020.

“**Group**” means Entrust Capital Limited, any of its subsidiaries or any group of companies in which Entrust Capital Limited is a subsidiary.

2. Personal Data that we may Collect

We process personal data about you that we obtain from you in the context of our business relationship with you. We do this in order to facilitate, enable and / or maintain our relationship and / or to provide services to our clients or for other reasons as specified below. This Personal Data may be collected about you indirectly from monitoring or other means (e.g. recording of telephone calls and monitoring e-mails). We also process Personal Data about you that we may have obtained from publicly accessible sources or that is legitimately transferred to us from third parties. This may include your organization (if applicable) as well as third parties not related to you, such as settlement service providers, central securities depositaries, exchanges, central clearing counterparties and other similar entities, databases, and third party service providers such as professional advisers, third party brokers, financial services providers, and risk consulting firms.

Types of Personal Data that we may Collect

The types of Personal Data we process may include:

- **Identification Data**
Name, date and place of birth, nationality, gender, marital status, domicile, passports, driving licence, ID cards, customer identifiers (CIF, IBAN / BIC), relationship identifiers (e.g. client segment and account currency), photographs, signatures.
- **Contact Details**
Phone numbers, postal and email addresses
- **Financial Data**
Payment data and account information, data from the fulfilment of our contractual obligations, source of wealth, incomes, benefits, shareholdings
- **Marketing and Sales Data**
This data includes customer relationship documentation, data relating to your habits and preferences
- **Data from your Interactions with Us**
This data includes from our internet website, file notes from meetings, calls, emails and phone conversations
- **Professional Data**
Your current and past professional roles and employment, and education (e.g. corporate title, membership of professional associations or bodies, career histories or biographies, job function, knowledge and experience in investment matters, qualifications and skills)
- Other data similar to the broad categories mentioned above.
- **Special Categories of Personal Data**
We may collect Personal Data revealing or concerning (directly or indirectly) racial or ethnic origin, communal origin, political affiliations or opinions, religious or philosophical beliefs, criminal convictions and offences, health, genetic data and biometric data.

3. Purpose and legal basis for Processing

We process your Personal Data for one of the following reasons:

- You have given your express consent;
- Due to legal or regulatory obligations;
- For a legitimate purpose;
- It is necessary for the performance of a contract; or
- In order to protect your vital interests or those of another natural person.

The below table sets out the purposes and the basis for why we may transfer Personal Data:

Processing Purpose	Basis of Processing
To consider opening an account, or entering into a relationship at your request, including performing anti-money laundering, anti-terrorism, sanction screening, fraud and other due diligence checks	<ul style="list-style-type: none">• Performance of a contract• Legal or regulatory obligation• Legitimate interests: ensuring we do not accept the proceeds of criminal activities or assist in fraudulent or any unlawful activities, such as terrorism
To deliver the services you have requested, including liaising with third parties	<ul style="list-style-type: none">• Performance of a contract• Legal or regulatory obligation• Legitimate interests: ensuring that you are provided with the best client services we can offer, and securing a prompt payment of any fees, costs and debts in respect of our services
To manage payments, fees and charges and to collect and recover money owed to us	<ul style="list-style-type: none">• Performance of a contract• Legitimate interests: ensuring we can manage payments, fees and charges and to collect and recover money owed to us
To manage our relationship with you which will include notifying you about changes to our terms of business or this Notice	<ul style="list-style-type: none">• Performance of a contract• Legal or regulatory obligation• Legitimate interests: ensuring we can notify you about changes to our terms of business or this Notice
To interact with governmental or regulatory bodies or other competent national authorities	<ul style="list-style-type: none">• Legal or regulatory obligation• Public interest
To detect or prevent fraud and/or other criminal activity and to protect our employees and assets	<ul style="list-style-type: none">• Legal or regulatory obligation• Public interest• Legitimate interests: protecting our and our client assets; detecting, and protecting against breaches of our policies and applicable laws; protecting our employees
To manage and protect our business, including improving data security, troubleshooting data and systems, system maintenance and testing, data hosting, managing our offices and other facilities	<ul style="list-style-type: none">• Legal or regulatory obligation• Legitimate interests: ensuring the efficient and secure running of our business, including through office and facilities administration, maintaining information technology services, network and data security and fraud prevention

To invite you to take part in market insight or other events, or client seminars or similar events, and to manage your participation in them

- Legitimate interests: ensuring our client records are up-to-date; promoting our client services; receiving feedback; improving our services; identifying ways to expand our business

To send you marketing (including by paper and electronic channels) communications and service updates.

- Legitimate interests: reviewing how clients use, and what they think of, our services; identifying ways to improve and expand our business

4. Consent

We may also process Personal Data as a result of your consent.

There may be circumstances where we ask for your consent to process your Personal Data. As long as you have granted us this consent, this processing is legal on the basis of that consent. Your consent must be freely given, by a statement or a clear affirmative action.

You can withdraw your consent at any time by contacting the person set out at the end of this Data Privacy Notice. Withdrawal of consent does not affect the legality of data processing carried out prior to withdrawal. However, if you do withdraw your consent, this may affect our ability to continue to act for you.

5. Who Receives my data?

We may transfer your Personal Data to the following recipients:

(a) The Group

We may share or otherwise process your Personal Data with entities in the Group:

- for risk control including internal approvals processes;
- to warehouse appropriate information within a single jurisdiction in order to coordinate the services and business activities of the Group;
- in connection with financial or regulatory reporting purposes.

(b) External Recipients of data

We may transfer Personal Data about you:

- to public entities and institutions (e.g. regulatory, quasi-regulatory, tax or other authorities, law enforcement agencies, courts, arbitrational bodies, fraud prevention agencies);
- to other credit and financial service institutions or comparable institutions in order to carry on a business relationship with you (depending on the contract, e.g.

- correspondent banks, custodian banks, brokers, securities exchanges, credit rating agencies);
- to third parties in connection with transactions that the Group are involved in (e.g. correspondent banks, brokers, exchanges, central clearing counterparties, depositaries, trustees, trade repositories, processing units and third-party custodians, issuers, investors, prospective buyers and other transaction participants and their representatives);
 - to prospective buyers as part of a sale, merger or other disposal of any of our business or assets to a natural or legal person, public authority, regulatory agency or body for which you have given us your consent to transfer personal data to;
 - to professional advisors including law firms, accountants, auditors and tax advisors;
 - to insurers;
 - to service providers and agents appointed by us.

The examples provided above are not exhaustive and we may need to transfer your Personal Data for other reasons.

6. Transfer of Personal Data to another jurisdiction

In certain circumstances, we may transfer your data to a jurisdiction outside of the DIFC. You understand that the data protection legislation in some such jurisdictions may not give you as much protection as the Data Protection Law. For transfers to jurisdiction that the DIFC does not consider offers an adequate level of data protection, we will only transfer your Personal Data as permitted otherwise by law, which may include us taking measures to implement appropriate and suitable safeguards for the protection of personal data by other means.

7. Storage of Personal Data

As we are a DIFC regulated entity, we will process and store your Personal Data for as long as is required by the applicable regulations, unless there is a particular reason to hold the records for longer, including legal hold requirements, which require us to keep records for an indefinite period of time.

8. Personal Data Security

We use a range of physical, electronic and managerial measures to ensure a level of security appropriate to the risk of Personal Data processing. These measures include:

- education and training of relevant staff to ensure they are aware of our privacy obligations when processing Personal Data as well as training around social engineering, phishing, spear phishing, and password risks;
- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- administrative and technical controls to restrict access to Personal Data;
- technological security measures, including fire walls,, and anti-virus software;
- physical security measures, such as building access controls;
- segregation of networks;
- endpoint security;
- layered and comprehensive cybersecurity defences; and

- security incident reporting and management.

You acknowledge that the security of data transmitted over the internet (including by e-mail) cannot be guaranteed and carries the risk of access and interception. You should not send us any Personal Data by open/unsecure channels over the internet. We endeavour to protect personal information but cannot guarantee the security of any Personal Data transmitted to us or by us.

9. Your Rights in relation to your Personal Data

We can obtain your Personal Data either through you sharing the information or another party may share your Personal Data with us. In certain circumstances you may have the following rights in relation to the processing of your Personal Data:

- **Access**
To request a copy of any Personal Data that we process about you and to be informed about how we use and share your Personal Data.
- **Object**
To object to the processing of your Personal Data if we are processing your Personal Data either on the grounds of legitimate interests or in the performance of a task in the public interest or if we are processing your Personal Data for direct marketing purposes.
- **Correction**
To request that we update your Personal Data, or correct any Personal Data that you think is incorrect or incomplete.
- **Erase**
To request that we delete any Personal Data that we process in relation to you where we do not have a legal or regulatory obligation or other valid reason to continue to process it.
- **Portability**
To request a copy of your Personal Data that you have provided to us as through the completion of an application form.
- **Source**
Where we have been provided with your Personal Data by another party, the source from which the Personal Data was obtained.

You may exercise your rights at any time. To the extent permitted by applicable law or regulation we reserve the right to charge an appropriate fee in connection with you exercising your rights.

We aim to respond to all legitimate requests within one calendar month. If we think it may take us longer than one calendar month, (such as where your request is particularly complex or you have made a number of requests), we will notify you and keep you updated.

You will not be disadvantaged in any way by exercising your rights in relation to the processing of your Personal Data.

10. Obligation to Provide Personal Data

In the context of our relationship, you may need to provide certain Personal Data that is required for accepting and carrying out our business relationship, fulfilling contractual obligations or that we are legally obliged or requested by a regulatory authority to collect. Without this data, we may not be in a position to enter into a legal agreement, provide services, or initiate or maintain a business relationship. For example, anti-money laundering regulations may require us to identify you on the basis of your identification documents before establishing a business relationship and to collect and put on record data including your name, place and date of birth, nationality, address and identification details for this purpose. In order for us to be able to comply with these statutory obligations, you must provide us with the necessary information and documents in accordance with such regulations, and to immediately disclose any changes over the course of our relationship. If you do not provide us with the necessary information and documents, we cannot enter into or continue the business relationship you require.

11. Automated Decision Making

In establishing and carrying out a business relationship, we generally do not use any fully automated decision-making pursuant. If we use this procedure in individual cases, we will inform you of this separately, provided this is a legal requirement.

12. Changes to this Notice

We may need to make changes to this Notice in the future. If we do, we will post updates to our website.

13. Complaints

You have the right to lodge a complaint with the Commissioner of Data Protection should you feel that there has been a contravention of the Data Protection Law or a breach of your rights.

14. Who is responsible for data processing and how can I contact them?

The legal entity responsible is:

Entrust Capital Limited
Level 5 Gate District 5, DIFC, Dubai, UAE.

If you have any questions about this Notice or the processing of your personal data, please contact us on:

Email: bkanaan@eiic.ae

Telephone: (04) 875 2600