



## **Alarabiya-Markets Privacy Policy**

Last Updated: July 30, 2018

This privacy policy (the “Policy”) explains how Alarabiya-Markets Ltd., entities to whose services/website you have registered (collectively “Alarabiya-Markets”, “we” or “us” and the member of the Alarabiya-Markets group to whose services you registered, the “Alarabiya-Markets Entity”) collects, uses and discloses personal information through its websites, mobile applications, and other online products and services that link to this Policy (collectively, the “Services”) or when you otherwise interact with us.

We encourage you to read the Policy carefully as it forms part of the relevant Alarabiya-Markets Entity’s terms and conditions, terms of business and/or terms of use, as the case may be.

### **Application of this Policy**

For the purposes of applicable international data protection laws, the respective Alarabiya-Markets Entity with whom you have registered is the “controller” of personal information collected through [www.Alarabiya-Markets.com](http://www.Alarabiya-Markets.com) (<http://www.Alarabiya-Markets.com>), other Alarabiya-Markets Group’s websites, widgets, mobile applications and other platforms (together the “Site”), and is the company to contact if you have questions about the use of your personal information (see the “Contact Us” section below). This policy also applies to personal data about each authorized representative of a client and about other persons or entities collected in the course of providing our services (such as directors of corporate clients).

### **Collection of Information**

#### **Information You Provide to Us**

We collect information you provide directly to us. For example, we collect information when you create an Alarabiya-Markets account, participate in any interactive features of the Services, fill out a form, participate in a contest or promotion, make a purchase, apply for a job, communicate with us via third party social media sites, request customer support, or otherwise communicate with us.

#### **When You Sign Up or Register for an Alarabiya-Markets Account or Services**

If you sign up for an Alarabiya-Markets account or Services, we will collect basic information about you including your name, email address and telephone number. You may provide this information to us directly, or by signing in to your account/service with a third party, including without limitation, Facebook or Google (see “Information We Collect from Other Sources” below). We will use the information that we collect about you to:

- Create and maintain your account;

- Allow you to log in to Alarabiya-Markets;
- Contact you about your account and/or the services that Alarabiya-Markets offers.

#### When You Provide Information to Build Your Profile

Once you have created an Alarabiya-Markets account, we will ask you to provide additional optional information about yourself to complete your “Profile”. The information we ask for includes your gender, date of birth, place of birth, addresses, nationality, national insurance number (or other government-issued identification number), citizenship and residency status, Tax ID, and information about your experience trading, education, source of income, investment aims and appetite, occupation, employer and employment position, annual income, investment portfolio, total cash and liquid assets and other details or questions as may be required in the Profile creation and process may be amended by us from time to time.

We will also ask you to provide a copy of an identification document, such as a passport, residency, visa or national identity card, a utility bill and such other documents as may be required by us in order to comply with our regulatory obligations and to verify your identity. Further details about the identification process can be found in the relevant Alarabiya-Markets Entity’s terms and conditions, terms of business and/or terms of use, as the case may be. We will use the information you provide in your Profile to:

- verify your identity and carry out checks that we are required to conduct by applicable laws and regulations, including without limitation, “know your client”, anti-money laundering, fraud, sanctions and politically exposed person checks;
- contact you on matters related to your account, including, to request any additional information or documentation;
- provide you with notices related to your account, general updates, market updates and other marketing materials, including, the Services offered by members of the Alarabiya-Markets Group
- tailor the products and services offered through the Site to you, including without limitation, to perform any suitability or appropriateness assessments for using our services and/or products, such as our high-leveraged trading services and Social Trading Features;  
assess your credit risk;
- assess your risk score according to parameters determined by Alarabiya-Markets;  
assess whether you qualify as a professional client, wholesale client or other specific category of clients;  
maintain administrative records relating to our business; and
- set up security measures to secure your account, including without limitation, to carry out two factor authentication.

You can update your Profile at any time by visiting the “Account” page in the Settings menu. We recommend that you update your Profile regularly, to ensure that the Alarabiya-Markets functions offered to you are appropriate for your current circumstances. You further agree to update such information upon Alarabiya-Markets’s request, if Alarabiya-Markets considers the information provided as untrue, incorrect, incomplete and/or inconsistent with other information provided by you at any time. You acknowledge that we may rely upon such information and that you are responsible for any damages or losses which may result from any inaccuracies, including without limitation, the inappropriateness of our Services to your

profile. You do not have to provide the information to complete your Profile, however if you choose not to, we may be unable to offer Alarabiya-Markets's full functionalities to you

#### When you Contact Us

If you contact us by telephone, email, post or use another function offered by Alarabiya-Markets, such as the chat feature. We will collect any information about the communication and any additional information that you choose to give us. We will use this information to review, investigate and respond to any comment or question that you may raise. Please note that we record and retain all telephone calls and other communication with us and may use it in our dealings with you including any dispute resolution or legal proceedings.

#### When an Alarabiya-Markets User Invites You to Use Alarabiya-Markets

Users of Alarabiya-Markets can invite their contacts to sign up for an account with us. We only collect the email addresses of individuals that users choose to invite to join Alarabiya-Markets, Alarabiya-Markets only uses the email addresses for sending an invitation to the individual at the request of the existing Alarabiya-Markets user.

### **Information About Your Use of the Alarabiya-Markets Services**

#### Usage Information

We collect information about your use of the Services, such as financial information and geo-location.

#### Automatically Collected Information

When you access or use our Services, we automatically collect information about you, including:

- **Log Information:** We collect log information about your use of the Services, including the type of browser you use, app version, access times, pages viewed, your IP address, any other network identifiers, and the page you visited before navigating to our Services.
- **Device Information:** We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers, and mobile network information.
- **Activities on the Site:** We collect records of activities on the Site, including, any content you post, your account details, the time, value and currency of any deposit, withdrawal, or transaction made and the payment method.
- **Location Information:** In accordance with your device permissions, we may collect information about the precise location of your device.
- **Information Collected by Cookies and Other Tracking Technologies:** We use different technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular and count visits. Web beacons are electronic images that may be used in our Services or emails and help deliver cookies, count visits, and understand usage and

campaign effectiveness. You can find out more about Alarabiya-Markets's use of Cookies in our Cookie Policy.

#### Information We Collect from Other Sources

We may obtain information from other sources and combine that with information we collect through our Services. We may also collect personal information about you from third party entities when we seek to verify your identity as part of our regulatory requirements. This may include, for example, identity verification agencies, credit referencing agencies and similar bodies. For example, we may collect information about you from third parties, when you use or connect to Alarabiya-Markets by or through a third-party platform, such as Facebook or another site, you allow us to access and/or collect certain information from your Third Party Platform profile/account as permitted by the terms of the agreement and your privacy settings with the third party platform. We will share such information with the third party platform for their use.

We will share some of the information we collect from you on installation of the mobile app with vendors and other service providers who are engaged by, or working with, us in connection with the operation of the services we provide to you. This information may also be shared with these parties for analytics purposes, which may require the reproduction and display of your information in an aggregated and anonymized manner that will not in any way identify you.

#### Use of Information

We use the information we collect to provide, maintain, and improve our services, such as to administer and verify your account, to provide the services you request and customize your experience with us. We also use the information we collect to:

- to carry out our obligations owed to you;
- to comply with our regulatory and other legal obligations;
- to monitor any content, you post;
- to administer transactions including deposits, chargebacks and payments;
- to monitor trading activity on Alarabiya-Markets, including by detecting inconsistencies in payments and trades and looking out for potentially illegal activities; and
- to determine whether a payment method is being abused;
- to compile statistical analysis of the pages of our platform and websites;
- to monitor and analyse our business;
- to investigate and to manage enquiries, disputes and legal proceedings and to comply with court orders, mandatory dispute resolution determinations and mandatory government authority or law enforcement orders or directions;
- to provide information about you and your trading with Us to credit reference agencies;
- to participate in crime prevention, legal and regulatory compliance and to assist regulatory, cybercrime, data and information protection agencies and police with their enquiries and enforcement, even if not compelled to do so;
- to develop and to market other products and services; and to novate, transfer to assign any of the rights or liabilities of the Alarabiya-Markets Entity

## **Sharing of Information**

We will not share the personal information we hold about you except in the following circumstances:

- between and among Alarabiya-Markets and Alarabiya-Markets Entity and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership; and
- with professional advisors, vendors, consultants, and other service providers, such as payment service providers, IT hosting companies, banks, other financial institutions and credit reference agencies who need access to such information to carry out work on our behalf;
- in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of Alarabiya-Markets by another company;
- in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements;
- if we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property, and safety of Alarabiya-Markets or others.

## **Social Sharing Features**

If you have elected to use one of our applications provided via social networks (such as Facebook, Twitter, G+ etc.), our application will access your social network account general information which includes your name and username in the social network, profile picture, gender, networks, user ID, list of friends, and any other information you have shared depending on the settings you establish with the entity that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.

## **Transfer of Information to Other Countries**

We process and store your personal information using data centers located inside the European Union and data centers located outside the European Union, including in Israel (where laws have been recognized as providing the same level of data protection as in the European Union). We and our service providers also may transfer your information to, or store or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. We will take steps to ensure that your personal data receives an adequate level of protection in the jurisdictions in which we process it. If you would like further information about the safeguards in place for transfers of personal information to our group companies or other third parties outside of the European Union, under the applicable data protection laws, please contact us (see "Contact Us" below).

## **Your Choices**

### **Account Information**

You may update, correct, or delete your information at any time by logging into your account or emailing us at [privacy@Alarabiya-Markets.com](mailto:privacy@Alarabiya-Markets.com). If you wish to delete or deactivate your account, please note that we may retain certain information as required by law or for

legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.

#### Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services.

#### Promotional Communications

You may opt out of receiving promotional emails or text messages from Alarabiya-Markets by following the instructions in those emails or text messages or by visiting the “Notifications” tab in the “Settings” menu on our platform. If you opt out, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

#### Mobile Push Notifications/Alerts

With your consent, we may send promotional and non-promotional push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

#### **Automated Analysis of Your Personal Information**

We use the personal information you provide to us, or that we gather when you use our services, to tailor Alarabiya-Markets to your Profile and to assign you a risk score. Alarabiya-Markets will carry out this analysis automatically, and in most cases without human intervention. You can update the information in your Profile at any time by visiting the “Account” page in the Settings menu. We recommend that you update your Profile regularly, to ensure that the Alarabiya-Markets functions offered to you are appropriate for your circumstances. If you have any questions about the automated analysis of your personal information, please contact us (see “Contact Us” below).

#### **Our Legal Basis for Using Your Personal Information**

If you are in the European Economic Area (“EEA”), when we process your personal data we will only do so in the following situations.

Entering into and Performing the Contract with You: If you have an Alarabiya-Markets account or have registered on the Site or for the Services, our legal basis for processing your personal information is that it is necessary for the performance of the relevant Alarabiya-Markets Entity’s terms and conditions, terms of business and/or terms of use, and to provide a service to you. With respect to an Alarabiya-Markets account, this includes facilitating access to our platform, processing payments and executing trades.

For other Justifiable Grounds, including Legal Obligation and Legitimate Interests: We process your personal information where necessary for Alarabiya-Markets to comply with legal and regulatory obligations we are under, and also where it is necessary for legitimate interests we have in conducting our business. These include without limitation:

- Learning about your interests and preferences to contact you with information that is relevant to you and helping us target marketing communication and advertisements so that they are more relevant to you.

- Using your pseudonymised details to show you advertising on social media platforms, such as Facebook or via other third-party advertising that may appear on other websites you use. The information shared with these platforms is pseudonymised to protect your personal data.
- Analyzing and continually improving the Site and our services and helping us pilot test versions of the Site internally to develop new features and ensure the efficient running of Alarabiya-Markets's services.
- Detecting and reducing fraud and credit risk.

### **Your Rights**

If you are in the EEA, you have certain rights and protections under the law regarding the processing of your personal data. If you are in the EEA, you have the right to access personal data we hold about you and to ask that your personal data be corrected, erased, or transferred. You may also have the right to object to, or request that we restrict, certain processing and in some circumstances to obtain a copy of the personal information in machine readable format. If you would like to exercise any of these rights, you can log into your account or contact us. Any such request should be submitted in writing to: [www.Alarabiya-Markets.com/customer-service/](http://www.Alarabiya-Markets.com/customer-service/)

### **Alarabiya-Markets Social Trading Platform**

Alarabiya-Markets is a real-time social trading platform, which integrates rich community and social characteristics into the trading platform. As part of the Alarabiya-Markets traders' network, traders who choose to be part of the community share their strategies and performance with the community. The amount traded is never disclosed and all traders are required to agree to be part of the network and share their strategies and performance.

Downloading, installing and accessing the Alarabiya-Markets Services constitutes your agreement and acknowledgment that the following information and content shall be considered non-confidential and non-proprietary information (other than your personal data as described below), collectively, the "Content" and shall be publicly shown on the Site: your username and full name, your picture/avatar (if provided), your state of residency, gender, networks, list of users who follow you, users who copy you etc., list of users you follow or copy, and any network status/posts/blogs and any other content options that enable our users to interact amongst themselves, including without limitation content and information you post on the Alarabiya-Markets community, comments, feedback, postings, "likes", blogs and/or all information that You provide to us via our website, our mobile apps, and/or by email, chat, fax or telephone and/or any other means. You can change your privacy settings at any time, and can make your trading activity private by clicking here (<https://www.Alarabiya-Markets.com/settings/privacy>).

### **Retention of Personal Information**

We store the information we collect on you for as long as is necessary for the purpose(s) for which we originally collected it, or for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations. The period for which we will retain personal information will vary depending on the purposes that it was collected for, as well as the requirements of any applicable law or regulation. For example, if you are invited to use

Alarabiya-Markets by another user, we will store your personal information for a period of six months in order to send an invitation to you by email. If you have an account with Alarabiya-Markets, we will store your personal information for as long as you maintain that account, and after you cease holding an account, for as long as we are required to by laws and regulations that are applicable to us.

### **Security and Integrity of Information**

We protect your personal information by using data security technology and using tools such as firewalls and data encryption. We also require that you use a personal username and password every time you access your account online. As set out in the relevant Alarabiya-Markets Entity's terms and conditions, terms of business and/or terms of use, you must not share your password with anyone else. We restrict access to personal information at our offices so that only officers and/or employees with a legitimate business purpose can access it.

### **Minors**

Alarabiya-Markets is not available for users under the age of 18 (or the age of legal consent for the jurisdiction, the user is located in) (a "Minor"). We do not knowingly collect personal information from or about Minors. If you are a Minor, you should not download or use any of our services nor provide any personal information to us.

If we become aware that a Minor has shared any information with us, we will delete such information. If you have any reason to believe that a minor has shared any information with us, please contact us at [www.Alarabiya-Markets.com/customer-service/](http://www.Alarabiya-Markets.com/customer-service/).

### **Changes to this Privacy Policy**

The Policy will be reviewed from time to time to take account of changes to our operations or practices and, further, to make sure it remains appropriate to any changes in law, technology and the business environment. Any personal information held will be governed by our most current Policy.

### **Links**

The Site may include links to other websites on the internet. We are not responsible for the content of these sites or for any other privacy practices on these internet sites. You should read the terms of use and the privacy statements of any such websites. Our terms of use and our Privacy Policy apply only to information collected by us in accordance with this Policy.

### **Contact Us**

Should you have any questions regarding the Policy, please contact us at: [privacy@Alarabiya-Markets.com](mailto:privacy@Alarabiya-Markets.com). Please include your name, and mailing or email address.