

PRIVACY NOTICE

1. Introduction

BTA Wealth Management Limited (“BTA”, “we”, “our” or the “Firm”) is committed to providing the highest level of protection regarding the processing of our clients’ personal data based on the applicable data protection laws and regulations. This Privacy Notice (the “Notice”) describes how BTA may collect, use, store, disclose or otherwise process personal data.

Please read this Notice carefully. By visiting BTA and using our website, you agree that your use of our website, and any dispute over privacy, is governed by this Notice.

All capitalized terms are defined within the meaning of the DIFC Data Protection Law No. 5 of 2020.

The term “personal data” is information that identifies an individual person or where an individual person can be identified. The term “processing” means everything that BTA can do with the data such as collecting it, recording, storing, adjusting, organising, using, disclosing, transferring or deleting.

2. Responsibility for data processing and how can you contact

BTA is a Data Controller in the Dubai International Financial Centre (“DIFC”) in accordance with the provisions set out in the DIFC Data Protection Law No 5 of 2020 (the “DP Law”). We are responsible for deciding how we hold and use personal information about you. We are required under the DP Law to disclose certain information about how we process your information. This includes details on when we are collecting or processing personal information about you, what we do with your information and who your information may be shared with.

We have appointed a Data Protection Officer who is responsible, amongst other things, for handling queries in relation to our data protection practices. If you have any questions about this Notice, including any requests to exercise your legal rights under the DP Law, please contact BTA using the details set out below:

- Email: dataprotection@bta.ae
- Mail address:
 - BTA Wealth Management Limited
 - Att: Data Protection Officer
 - Emirates Financial Towers, South Tower, Unit 1301, Level 13,
 - DIFC, PO Box 507101, Dubai, United Arab Emirates
- Telephone: +971 44 573 171

3. Scope of this Notice

This Notice sets out our practices when processing personal data in the context of professional relationships with our clients to whom BTA provides products or services or enters into any transaction. BTA collect and otherwise process personal data relating to past and existing clients, prospect clients and any other person involved in the business relationship, such as clients’ authorised representative, persons holding a power of attorney, guarantors, beneficiaries, board members, beneficial owners and other individual business contacts (collectively referred to as “you”, “your” or “client(s)”).

4. Information we hold about you

BTA collects certain personal data in the course of providing investment services to its clients. BTA may collect the personal data directly from individuals through communications and BTA’s applications forms, whether we receive these in writing or electronically. This can include, but not limited to, the information set out below:

- **Identity information:** includes information such as first name, surname, gender, marital status, age/date of birth, name of partner and children(s), passport number, place of birth, nationality(ies), individual tax ID and country of tax residence and proof of identity such as a copy of your passport or equivalent document when we identify and verify individuals or to meet tax, Anti-Money Laundering (“AML”) and other “Know Your Customer” (“KYC”) legal and regulatory obligations.
- **Contact information:** includes information such as billing address, delivery address, email address and telephone number(s).
- **Personal information:** such as details on your education, profession, employment details, details on source of wealth (origin and how is composed) and source of funds, bank details and/or bank statements, tax details, information to assess whether you might be a politically exposed person or represent a money laundering risk, financial knowledge and understanding, investment experience, risk ability and understanding of your goals and objectives in looking for our services, where applicable.
- **Digital information:** related to your use of our website, platforms and digital applications (if applicable), including traffic data, location data, behavioural data and other communication data.
- **Relationship information:** includes your preferences in receiving marketing from BTA and our third parties (if applicable) and your

communication preferences. This helps BTA to understand more about how to conduct business with you and what types of products and services may be of interest to our client(s).

- **Other information:** This includes CCTV footage when you visit our office premises and telephone conversation / video conference recorded with you through our recorded lines.

For limited purposes, such as in the case of undertaking AML and KYC checks, it may be necessary for BTA to process special categories of personal data. This may include data about criminal convictions and information about your political opinions if we are authorised to use this information under the DP Law. In these circumstances, we will process such personal data only when there is a legal basis we can rely on under the DP Law.

5. What happens if personal data is not provided

In certain circumstances where an individual does not provide personal data which is required, we will not be able to provide the products and services under our contract with clients or may not be able to comply with a legal obligation imposed on BTA. Where we need to collect personal data by law, or under the terms of a contract and you fail to provide this information when requested, we may not be able to perform the contract we have or are trying to enter with you. In this case, we may have to cancel a product or service you have with BTA, but we will notify you if this is the case, at the time.

6. Where we collect your personal data from?

This Notice applies when we collect individuals' personal data directly from the individual or when we collect it from any other third parties. You can provide your personal data directly to BTA by filling in our account opening forms for various services and products, through meetings with BTA or by communicating with BTA by post, telephone, e-mail or using other means. We may collect personal data provided by your company or an intermediary, from your agents, advisers, intermediaries and custodians of your assets or from third party sources, which may include third party referrals, verification processes such as due diligence checks, social media such as Facebook, Twitter, LinkedIn or other public internet sites, information stored in databases providers (such as but not limited to, World-check, Lexis Nexis, other similar providers) and credit reference agencies, government agencies or even financial institutions.

We also process personal data that we obtain from publicly accessible sources (such as but not limited to, press, sanction lists, internet searches) or that is legitimately transferred to BTA by from third

parties (e.g., exchanges and other similar entities) for KYC and AML purposes.

7. Purpose of processing your data and legal basis

We must have a legal basis to process your personal data in accordance with the DP law. In most cases, we will use your personal data in the following circumstances:

- **Where we need to fulfil our contractual obligations with you**
Data is processed to provide financial services in accordance with the legal agreements with our clients. This also includes carrying out pre-contractual measures that occur as part of a request from an interested party. The purposes of data processing are primarily in compliance with the specific product or service and can include needed assessments, advice, investment execution services and other financial services, as well as carrying out transactions. You can find further details about the purposes of data processing in BTA's Client Agreement, Terms of Business and other related documentation.
- **Where we need to comply with legal and regulatory obligations**
BTA as a regulated firm is subject to several legal and regulatory requirements applicable in the DIFC. The purposes of processing include identity checks, fraud and money laundering prevention, and fulfilling compliance reporting obligations under financial regulation.
- **When pursuing our legitimate interests and those of third parties**
A legitimate interest will apply only where we consider that it is not outweighed by an individual's interests or rights, which require protection of their personal data. We have determined that our legitimate interests include the following activities:
 - Compliance with applicable regulatory standards;
 - Recording telephone lines and monitoring communications to comply with law;
 - Conducting internal and external audits for the legitimate purposes of managing our business;
 - BTA accounting purposes;
 - Receiving professional advice to protect our business;
 - Prevention and detection of financial crime and fraud;
 - Evaluating, bringing or defending legal claims;
 - Managing our business and other risks as may be required to operate as an effective, efficient, and financially prudent firm.
- **As a result of your consent**
If BTA decides to process personal data on the basis that is not covered by any of the above legal justifications, we will rely on your consent as the lawful basis. As long as you have granted BTA consent to process your personal data for certain purposes, the

processing is carried out on the basis of your consent. Consent given to BTA can be withdrawn at any time and does not affect the legality of data processed prior to withdrawal. Further details regarding how to contact BTA are listed in section 2 above.

8. Purposes for which we will use your personal data

We have outlined below a description of the key purposes for which we need to use your personal data, and the applicable lawful basis for processing your data. We have also identified our legitimate interests in certain circumstances, where appropriate. Please contact BTA if you need further details about the specific legal basis, we are relying on to process your personal data specified below:

- **Fulfil of contractual obligations**

BTA needs to process your personal data because it is required for the performance of a contractual relationship where you are one of the parties in the legal agreement, or to take steps at your request prior to entering a contract. As such, we will use your personal data for:

- Onboarding you as a prospect or new client, verify your identity, carry client due diligence, undertaking searches, looking for references or information and if required, making other inquiries if we consider necessary;
- Providing you with our services agreed between both parties in the Agreement which might be amended from time to time;
- Facilitating smooth running of the business through communication with clients about our products and services;
- Fulfilling certain requirements such as but not limited to, a transaction initiated by a client, to manage wire transfers, fees and charges;
- Dealing with any complaints or any feedback you might have to BTA;
- Any other purpose for which you provide BTA with your personal data.

- **Comply with legal/regulatory obligations**

BTA needs to process your personal data for our compliance and legal obligations that we are subject to. As such, we will use your personal data for:

- Onboarding you as a prospect or new client, verify your identity, carry client due diligence, undertaking searches, looking for references or information and if required, making other inquiries if we consider necessary;
- Performing checks and to take decisions whether to onboard or not a client;
- Facilitating smooth running of the business through communication with clients about our products and services;

- Undertake financial crime mitigation measures such as but not limited to, verification of identity and checking transactions for AML purposes;
- Meet compliance obligations that apply to BTA for regulatory reporting purposes or if required by any regulatory, monetary, tax or fiscal authorities as well as any competent court or legal authority empowered to do so;
- Meet legal and regulatory requirements such as but not limited to, prevention of money-laundering, financing of terrorism, fraud, tax evasion, bribery and corruption or any other crimes punishable under the applicable law in place that may be amended from time to time;
- Maintaining database management and business records of products, services and other transactions;
- Conducting audits for the legitimate purposes of the business and to meet regulatory requirements;
- Accounting purposes;
- Addressing and resolving issues and complaints internally and to enhance our services.

- **Legitimate interests**

BTA needs to process your personal data because it is necessary for our legitimate interests, or sometimes where it is necessary for the legitimate interests of another person. As such, we will use your personal data for:

- Facilitating smooth running of the business through communication with clients about our products and services;
- Fulfilling certain requirements such as but not limited to, a transaction initiated by a client, to manage wire transfers, fees and charges;
- Managing our relationship with you, including but not limited to, the development of the relationship, carrying out any marketing activities, make suggestions and recommendations to you about products or services that may be of interest to you;
- Managing how we work with other companies / services providers that provide services to BTA and our clients;
- Undertake financial crime mitigation measures such as but not limited to, verification of identity and checking transactions for AML purposes;
- Meet compliance obligations that apply to BTA for regulatory reporting purposes;
- Enforce or defend the rights of BTA employees;
- Maintaining database management and business records of products, services and other transactions;
- Conducting audits for the legitimate purposes of the Business and to meet regulatory requirements;
- Accounting purposes;
- Conducting internal product analysis and market research in order to develop and improve our products and services to clients;

- Addressing and resolving issues and complaints internally and to enhance our services.

9. Who receives your personal data

We will disclose personal data of individuals where it is necessary to fulfil specified purposes outlined above. We require third parties to respect the security of your personal data and to treat it in accordance with the DP Law. We may transfer and disclose your personal data with a range of parties which may include:

- **External Recipients of Data**

We will transfer personal data about you while conducting our usual business, or as part of meeting our legal, regulatory or market practice requirements to the following external recipients:

- To public authorities such as tax authorities, supervisory authorities and other government agencies, security or police authorities as part of our regulatory reporting requirements;
- To other third-party agencies and suppliers in order to carry out AML/KYC/PEP checks and comply with legal obligations;
- To other third-party financial firms in order to meet our contractual obligations, market practices and compliance standards in connection with transactions and the services that we provide you with (such as banks, brokers, exchanges, clearing houses, trade repositories, processing units and third-party custodians, issuers, authorities, and their representatives);
- To third parties who have introduced customers such as financial service providers, your agents, advisers and intermediaries in order to process the personal data for the purposes as set out in this Notice;
- To third parties who work on our behalf to service or maintain client accounts and relationships, such as administrators and investment managers including those external to BTA.

- **To service providers and agents**

We will transfer your personal data to service providers and agents appointed by BTA for the purposes outlined in the Notice, subject to maintaining banking confidentiality which may include:

- Third parties who manage our physical premises;
- Third parties who service or maintain our business contact database and those who support our website;
- Third parties providing services to BTA such as our professional advisers (e.g., auditors, lawyers, accountants or public relations advisers);
- Third parties who process data on our behalf as part of our outsourcing arrangements including IT service providers and data storage providers.

10. How secure is your information with third-party service providers

All third-party service providers that handle our data are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

11. Cookies

We may use cookies and similar technologies on our website. Cookies are text files that get small amounts of information, which your computer stores when you visit a website. When you return to the website or visit website and mobile apps (if applicable) that use the same cookies, they recognise these cookies and therefore your device. We use cookies to do many different jobs, like letting you navigate between pages efficiently, remembering your preferences and generally improving your online experience. They can also help ensure that the ads you see online are more relevant to you and your interests.

12. Transfer and processing of personal data

When sharing your personal data with third parties as set in this Notice, some of the recipients may be based outside the DIFC so the processing of your personal data will involve a transfer of data outside the DIFC jurisdiction. When we share information with organisations in another jurisdiction, we will ensure they agree to apply equivalent levels of protection for personal data as we do under the applicable DIFC legislation. Also, if they are not in a jurisdiction that the DIFC Data Protection Commissioner regards as having adequate levels of protections for personal data, we will put in place appropriate safeguards (such as contractual commitments, by adopting the standard clauses as prescribed by the DIFC Commissioner), to ensure that your data is adequately protected.

Your personal data will only be transferred outside the DIFC on one of the following basis:

- The jurisdiction where we send the personal data is providing an adequate level of protection for personal data;

- The DIFC Data Protection Commissioner has granted a permit or written authorisation for the transfer or the set of transfers and BTA apply adequate safeguards with respect to the protection of this personal data;
- You have explicitly consented to the proposed transfer;
- The transfer is necessary for the performance of a contract between you and us or the implementation of pre-contractual measures taken in response to your request;
- The transfer is necessary for the conclusion or performance of a contract concluded in your interest between us and a third party;
- The transfer is necessary or legally required on grounds important in the interests of the DIFC, or for the establishment, exercise or defence of legal claims;
- The transfer is necessary in order to protect your vital interests;
- The transfer is necessary to uphold our legitimate interests recognised in the international financial markets, provided that such is pursued in accordance with international financial standards and except where such interests are overridden by your legitimate interests of relating to your particular situation;
- The transfer is necessary to comply with any regulatory requirements including but not limited to, auditing, accounting, Anti-Money Laundering or Counter Terrorist Financing obligations or the prevention or detection of any crime that apply to us.

Please contact BTA if you would like to request to see a copy of the specific safeguards applied to the export of your information to such jurisdictions.

13. Marketing communications

We are committed to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. If you receive marketing directly from BTA, you can opt out of, or object to receiving marketing by contacting your relationship manager or emailing BTA on dataprotection@bta.ae. Additionally, we will ensure that any outside companies assisting BTA in marketing our products and services, or with whom we have marketing agreements (if applicable), are under contractual obligations to protect confidentiality of personal data, and to use it only to provide the services we have asked them to perform.

14. How long we will store personal data for

We will retain the personal data of individuals covered by this Notice for as long as required to fulfil the purposes for which the data was collected including for the purposes of satisfying any legal, accounting, or reporting requirements. In general terms, this will mean that personal data will be kept for the duration of our relationship with the individual and:

- the period required by tax, company and financial services laws and regulations (including, without limitation any Dubai Financial Services Authority (“DFSA”) retention periods);
- as long as it is necessary for individuals to be able to bring a claim against BTA and for BTA to be able to defend itself against any legal claims. This will generally be the length of the relationship plus the length of any applicable statutory limitation period under applicable law.

In certain circumstances, personal data may need to be retained for a longer period of time where extended retention periods are required by law and in order to establish, exercise or defend our legal rights.

15. Your rights

Individuals are granted certain rights in relation to their personal data which will apply in certain instances. If an individual would like to exercise, or discuss, any of these rights, they should submit their request to dataprotection@bta.ae and provide sufficient information to allow BTA to understand the scope of the request. Under certain circumstances set out in the DP Law you have the right to:

- **Request Access:** Individuals are entitled to ask BTA whether we are processing their personal data and, if we are, they can request access to their personal data. This enables them to receive a copy of the personal data we hold about them and certain other information about it.
- **Request Correction:** Individuals are entitled to request that any incomplete or inaccurate personal data we hold about them be corrected.
- **Request Erasure:** Individuals are entitled to ask BTA to delete or remove personal data in certain circumstances. However, we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Objection:** Where we are processing personal data based on legitimate interests an individual may challenge this. However, we may be entitled to continue processing personal data based on our legitimate interests or where this is relevant to legal claims. An individual also has the right to object where we are processing personal data for direct marketing purposes.
- **Restriction:** Individuals are entitled to ask BTA to restrict the processing of their personal data, for example if they want BTA to establish its accuracy or the reason for processing it.

- **Portability:** Individuals are entitled to request the transfer of their personal data to another third party in limited circumstances.
- **Automated Decisions:** Individuals are entitled to contest any automated decision made about them where this has a legal or similarly significant effect and to require such decision to be reviewed manually in certain instances.
- **Non-discrimination:** Individuals will not be discriminated against for exercising their rights under the DP Law.
- **Consent:** If our processing is based on consent, individuals can withdraw their consent at any time by contacting dataprotection@bta.ae. This will not affect the lawfulness of processing based on consent before such withdrawal.
- **Contact Supervisory Authority:** We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the DIFC Data Protection Commissioner through commissioner@dp.difc.ae or via mail to the DIFC main office: The Gate, Level 14, DIFC, PO Box 74777, Dubai, UAE, Tel: +971 (0)4 362 2222.

For more information about your rights please visit the DIFC website and search for DIFC Data Protection.

16. Changes to the Notice

A copy of this Notice can be requested from BTA using the contact details available above. We may modify or update this Notice from time to time. Where changes to this Notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice.