DAMAN MARKETS

Privacy Policy

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Introduction

Daman Markets Financial Services LLC ("**Daman Markets**" Us, or the "**Company**") is a company incorporated with limited liability and existing under the laws of the United Arab Emirates, under registration number 2389524 with commercial license number 1393481. Daman Markets is licensed and regulated by the UAE Capital Markets Authority ("**CMA**") under Category 1 Licence (CMA Licence No. 20200000356), authorized as a trading broker of OTC derivatives and currencies in the spot market, having its principal place of business at World Trade Center, Dubai, United Arab Emirates.
Daman Markets observes the requirements of the existing prevailing laws on privacy and data protection locally concerning privacy and electronic transactions, including the principles and practices governing the collection, processing, storage, and sharing of personal data in compliance with applicable laws and regulations in the UAE, including Federal Decree Law No. (45) of 2021 Concerning the Protection of Personal Data (the "**UAE Personal Data Protection Law**") and the CMA Rulebook for Financial Activities.

This Privacy Policy ("**Policy**") (together with our Client Agreement and any other documents referred to in it) sets out the basis on which we access, collect, store, use, and/or share ("**process**") any personal data from our clients ("**Client**" or "**you**"), or that you provide to us.

By visiting our website www.damanmarkets.com ("**Website**") you are accepting and consenting to the practices described in this Policy. We provide comprehensive training to all employees who handle personal data, ensuring they uphold the highest standards of data confidentiality and respect for individual privacy.

We will ensure that the management of your personal data complies with the applicable laws and regulations and this Policy, monitor data protection compliance, managing data protection inquiries and liaise with the UAE Data Office and the CMA, as required.

You have the right to object to certain uses of your personal data including the use of your personal data for direct marketing.

We recommend that you read this Policy to understand your privacy rights and choices. If you have any questions about your data protection rights or if you do not understand anything explained in this Policy, please contact us.

Unless otherwise defined herein, capitalized terms used in this Policy shall have the meanings given to them in the Client Agreement.

Who does this Policy apply to?

This Policy applies to our Clients, as well as any individual who accesses our website or otherwise engages with us, including via call or email or in-person visit.

What types of personal data are being collected?

Personal data means any information that can be used to directly or indirectly identify a specific individual, including your name, identification number, contact information and geographic location. This also includes personal data collected offline through our Client Engagement (i.e. expos and seminars), direct marketing campaigns, and online through our website, applications, and branded pages.
You, as a Client, are not required to provide Daman Markets with any personal data, however if you choose not to do so, we may not be able to provide you with our products or services or respond to any queries you may have.

We may collect personal data from a variety of sources. This includes:

- Personal data you give us directly;
- Personal data we collect automatically, and
- Personal data we collect from other sources.

You may be asked to provide your personal data when you are in contact with us. Daman Markets may share this personal data and use it in a manner consistent with this Policy.

Who is collecting your personal data?

Any personal data provided to or collected by Daman Markets is controlled by Daman Markets with details of the license and regulations mentioned above. This Policy applies to personal data collected by Daman Markets in connection with the services and products we offer.
This Policy also applies to Daman Markets' marketing content, including offers and advertisements for Daman Markets products and services, which the Company (or a service provider acting on our behalf) sends to individuals on third-party websites, platforms and applications based on site usage information.
These third-party websites generally have their own Privacy Policy and Terms & Conditions. We encourage you to read them before using those websites. Daman Markets is not responsible for any collection, processing, or use of personal data carried out by third-party websites or their operators.

Ways in which we collect your personal data

We may collect personal data from a variety of sources. This includes:

- **Personal data you give us directly.** We collect personal data about how you use our services and products, such as the types of content you view or engage with, or the frequency and duration of your activity. We will also collect your personal data when signing up for a marketing newsletter or registering on our website. In so doing, we may ask for personal data such as your name, gender, date of birth, address, email address, and telephone number.

- **Personal data we collect automatically.** We also receive and store certain types of personal data whenever you interact with us online. For example, we use cookies and tracking technologies to obtain personal data when your web browser accesses our websites or advertisements and other content served by or on behalf of Daman Markets on other websites. Your personal data is also collected when you search, post,

or participate in a contest or questionnaire or communicate with our customer services teams.

Types of personal data we collect include your IP address, device ID, location data, computer and connection information such as type and version, time zone setting, browser plug-ins and versions, and operating system. We may also collect technical information to help us identify your device for fraud prevention and diagnostic purposes.

- **Personal data we collect from other sources.** We collect personal data from other sources including our trusted partnerships, affiliates, service providers, or publicly available sources, but only where we have checked that these third parties have your consent or are otherwise legally permitted or required to disclose your personal data to us.

  We use the personal data we receive from these third parties to enhance the services we provide to you, such as providing curated content that is relevant to the service we provide to you or topics you are interested in.

Purposes for using and processing your personal data

We process your personal data for a variety of reasons, depending on how you interact with us and our services, including:

To facilitate account creation and authentication and otherwise manage user accounts. We may process your personal data so you can create and log in to your account, as well as keep your account in order.

To deliver and facilitate delivery of services to you. We may process your personal data to provide you with the requested service.

To satisfy our legal or regulatory obligations. We may process your data to conduct any KYC/AML procedures, client categorisation, transaction monitoring, and risk assessments required.

- To respond to your inquiries/offer support to you. We may process your personal data to respond to your inquiries and solve any potential issues you might have via chat, email, and phone.
- To send administrative and/or marketing information to you. We may process your personal data by sending you details about our products and services, changes to our terms and policies, and other similar information.

To facilitate the operation of our business. We may process your personal data to manage our risk and financial position, test our systems and controls, review and improve our processes, conduct audits, test new products and services, and collect and recover any money owed to us.

To develop and innovate marketing activities. We may process your personal data to understand what our Clients' needs are, explore new market segments and develop products of which align with these interests.

- To save or protect an individual's vital interest. We may process your personal data when necessary to save or protect an individual's vital interest, such as to prevent harm.

Lawful basis for processing your personal data:
Our basis for collecting and using the personal data described above will depend on the personal data concerned and the specific context in which we collect it.
We will collect personal data from you only where we have your consent to do so, or where one of the following instances apply:

- where we need the personal data to perform a contract with you;
- where the processing is necessary for compliance with our legal or regulatory obligations; or
- where the processing is necessary to protect your interests or the public interest.

If you have questions or require clarifications concerning the lawful basis on which we collect and use your personal data, you may contact us.

With whom do Daman Markets share your personal data with?

Daman Markets may disclose your personal data to the following categories of recipients:

- To our **group of companies, third-party service providers and partners,** who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who otherwise process personal data for purposes that are described in this Policy or notified to you when we collect your personal data.

- To any **competent law enforcement body, regulatory, government agency, court, or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish, or defend our legal rights, or (iii) to protect your vital interests or those of any other person. This includes any disclosures made for the purposes of supervisory audits, compliance inspections, and legal enforcement as required under CMA rules.

- To a **potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger, or acquisition of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes disclosed in this Policy.

- To any **other person with your consent** to the disclosure.

How does Daman Markets keep your personal data secure?

We protect your personal data by using appropriate technical and organisational measures, which are implemented to safeguard personal data against unauthorised access, disclosure, alteration, or destruction. These measures are designed to provide a level of security appropriate to the risks of processing your personal data, including the following measures:

- We hold your personal data in secure facilities and on secure servers;

- We use encrypted and secure transmission protocols;
- We use other safeguards such as firewalls, authentication systems (e.g. passwords, codes), and access control mechanisms to control unauthorised access to systems and data;
- We regularly review personal data held or controlled by us, conduct system audits and assessments, storage and processing practices, including physical security measures, to guard against unauthorised access to systems; and
- We restrict access to personal data to our employees and contractors who are subject to strict confidentiality obligations. The Company may take disciplinary measures up to and including termination in relation to individuals who maliciously or improperly access or acquire personal data without being entitled to its access.

We also seek to ensure our third-party service providers do the same. We only appoint service providers under appropriate contract who provide sufficient guarantees about data security in accordance with the applicable laws and regulations.
While we continually monitor and enhance our security systems, we also encourage you to take precautions when sharing information online.

Does Daman Markets use cookies and other tracking technologies?

The Company uses cookies to enhance website functionality and user experience. Some of the cookies that Daman Markets sets up when you visit our website are essential to the working functionality of the site. Without these cookies, Clients would not be able to chat online, fill out trading applications, or deposit funds. Performance cookies are another type that the Company uses to provide a better experience and to improve how content on our website is presented. Clients can manage cookie preferences through browser settings.
Marketing cookies are also set out by third-party advertising networks to ensure we are providing our Clients with targeted advertisements more relevant to your interests.
For more details, refer to our Cookie Policy.

International personal data transfers

We may transfer your personal data to, or host it on systems operated by, a third party outside UAE for further processing in accordance with the purposes set out in this Policy.
In these circumstances, as required by the UAE Personal Data Protection Law, we ensure that your privacy rights are adequately protected by appropriate legal, technical, organisational or contractual, means. These include ensuring the country of transfer has data protection laws in place which have an adequate level of protection as in place in the UAE and/or putting in place data transfer agreements for transfers of personal data between our group companies, which require all group companies to protect the personal data they process from the UAE in accordance with UAE Personal Data Protection Law. The Company has also implemented similar appropriate safeguards with our third-party service providers and partners, and further details can be provided upon request.

Data retention

We will only retain the personal data provided by you for as long as it is necessary to carry out the purposes set out in this Policy, unless a longer retention is required or permitted by law (such as tax, accounting or other legal requirements). The Company will not retain any of the Client's personal data beyond this period and all personal data is subject to periodical review. Personal data related to financial transactions or client onboarding will be retained for a minimum of ten (10) years after the end of our relationship with you, as required by CMA regulations.

Automated decision making

Automated decisions mean that a decision concerning you is made automatically based on computer determination (using software algorithms), without human review. The Company makes automated decisions at account opening, where we check that the products or services offered are suitable for you based on the information provided to us. We may use information about your financial standing or socio-demographic information to assess whether you have suitable experience and qualifications to understand the risk involved when accessing our products or services. When the Company makes an automated decision about you, you have the right to contest the decision, to express your point of view, and to require a human review of the decision.

Your data protection rights

Subject to certain exemptions, the UAE Personal Data Protection Law provides you with the following rights in relation to your personal data:

- **Right to obtain information:** You have the right to request any of the following information:
    - the types of personal data that is processed;
    - the purposes of processing;
    - decisions made based on automated processing or decision making;
    - targeted sectors or establishments with which your personal data is to be shared, whether inside or outside the UAE;
    - controls and standards for the periods of storing and keeping your personal data;
    - procedures for correcting, erasing, limiting or objecting to the processing of your personal data;
    - protection measures for international personal data transfers;
    - procedures to be taken in the event of a breach or infringement of your personal data, especially if the breach or infringement poses a direct and serious threat to the privacy and confidentiality of your Personal Data; and
    - the process of filing complaints with the UAE Data Office.

- **Right to access**: You have the right to obtain a copy of the personal data we hold about you.
- **Right to rectification:** You have the right to request that we rectify any inaccurate and/or complete any incomplete personal data. We will then correct our records and notify any third parties to whom such personal data may have been transmitted as described above.
- **Right to data portability:** You have the right to request a copy of all information personal data you have provided to us in a structured and machine-readable manner. Additionally, you have the right to request that we transfer, after which we will transmit that your personal data to another data controller of your choice where this is technically feasible.
- **Right to opt out:** You have the right to opt out of marketing communications. You can exercise this right by clicking the "unsubscribe" or "opt-out" link in the marketing e-mails we send you, or for SMS communications reply with "STOP."
- **Right to withdraw consent:** You have the right to withdraw consent to the processing of your personal data at any time. Such withdrawal will not affect the lawfulness of processing based on your previous consent. If you withdraw your consent, you may not be able to benefit from certain service features for which the processing of your personal data is essential.
- **Right to restrict processing:** You have the right to restrict our processing of your personal data in any of the following cases, unless there is a lawful reason for not doing so:
    - if you object to the accuracy of the personal data, in which case the processing shall be restricted to a specific period to allow us to verify accuracy of the data;
    - if you object to the processing of your personal data in violation of the agreed purposes; or
    - if the processing is made in violation of the UAE Personal Data Protection Law.
- **Right to object to processing**: You have the right to may request that we stop processing your personal data. Please note that if you withdraw your consent, you may not be able to benefit from certain service features for which the processing of your personal data information is essential.
- **Right to object to automated processing:** You have the right to object to decisions made with respect to automated decision making, in accordance with section 0 above.
- **Right to erasure**: You have the right to request that we erase your personal data, and we will comply unless there is a lawful reason for not doing so.
- **Grievance:** Where you believe your personal data is not being processed in accordance with the applicable laws and regulations, you have the right to lodge a complaint with us and/or the UAE Data Office. We suggest that you contact us about

any questions or if you have a complaint in relation to how we process your personal data. Your complaints will be handled in accordance with our Complaints Policy.

If you wish to exercise any of these rights, visit the regulatory section of our Website or contact us. You may be required to prove your identity for us to comply with your requests. We respond to all requests we receive from individuals wishing to exercise their data protection rights without undue delay, and in any event within 30 days, in accordance with UAE Personal Data Protection Law.

Updates to this Policy

We may update this Policy from time to time to reflect changes in legal, technical, or operational requirements. When we update this Policy, we will publish the updated version on our website and take appropriate measures to inform you, consistent with the significance of the changes we make.