



HALKIN
INVESTMENTS

HALKIN INVESTMENTS MIDDLE EAST LIMITED

PRIVACY NOTICE

INTRODUCTION

Protecting the confidentiality and security of personal information is integral to the way in which **Halkin Investments Middle East Limited** and its affiliates (“**HIMEL**”) conducts its business. We are committed to safeguarding the privacy of our clients and use the personal information in accordance with our privacy principles set out below. The following are major points from our updated Privacy Policy statement that will help to explain the data processing practices of HIMEL.

In accordance with the DIFC Data Protection Law, **HIMEL** being the data controller, must provide you with information on how your personal data will be processed. Please take a moment to read this Notice so that you know and understand the purposes for which we may collect, use and/or disclose your personal data.

PURPOSES OF PROCESSING AND LAWFUL BASIS OF PROCESSING:

The personal data collected from you, provided by you or obtained from other sources on your behalf will be held, disclosed and processed by HIMEL for the purposes of offering you our services and maintaining a relationship with you.

We process personal data only for lawful purposes.

Presently, we collect, use and disclose your personal data for the following lawful purposes:

A. In connection with the products and services offered:

- for opening, operation, administration or continuation of accounts with us and/or any service providers/partners;
- evaluating your standing, resources and capabilities to enter or maintain a relationship with you;
- analyzing your financial situation and determining financial strategies and products suitable for you as our client;
- assessing and processing any applications, requests and instructions for financial products and services offered by us and/or other financial institutions or product providers for you as our client;

- managing commercial and financial risks, including preventing, detecting and investigating crime, including fraud and any form of financial crime;
- sending you updates and information in relation to our management of your investments, our services, products, newsletters and related investment and market information, reports or commentaries;
- responding to your queries and requests and handling complaints;
- managing our administrative and business operations and complying with internal policies and procedures;
- processing any corporate actions which affect your investments;
- maintaining records of our interactions with you, through telephone recordings, documentation (hard copy and electronic);
- carrying out due diligence, monitoring or other screening activities in accordance with our legal or regulatory obligations or risk management procedures;
- compliance with any applicable rules, laws and regulations, industry codes of practice or guidelines and any directives or best practices issued or administered by any regulatory authorities or relevant trade bodies or to assist in law enforcement and investigations by relevant authorities;
- any purpose that is reasonable and incidental to our provision of our products or services to you.

B. In the case where you submit an application to us as a candidate for employment:

- for processing your application including the conducting of pre-recruitment checks, such as in relation to your credit standing and qualifications;
- for providing or obtaining references and for background screening/vetting from your referees, past employers, present or past colleagues and the staff of past academic institutions;
- for collecting information to assess your suitability for the position applied for;
- for communicating with you as is required to comply with our policies and processes, including for business continuity purposes;

- for maintaining our records where you have not been successful in your job application to us, to inform you should a suitable position which might be of interest to you be open in the future; or where you are subsequently employed by us and thereafter leave our employment, to provide you a reference, when so requested by your future prospective employer; and
- for any other purposes relating to the aforesaid

C. Legitimate interest

- for carrying out statistical analysis and market research;
- for recording, maintaining, storing, and using recordings of telephone calls that you make to and receive from HIMEL.

Please note that where personal data is processed for purposes of legitimate interests, you have a right to object to such processing and HIMEL will no longer process the personal data unless HIMEL can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

CONSENT

From time to time, HIMEL may send you information about financial markets, products etc., by telephone, by email or by other reasonable means of communication. If you do not wish to receive the information, you can inform us.

Your consent is not required to process your personal data for the purposes referenced above. However, in order to process your personal data for the purposes of direct marketing, HIMEL seeks your consent.

You have a right to withdraw this consent at any time. However, your withdrawal of consent will not affect the lawfulness of processing based on consent received before its withdrawal.

You can withdraw your consent by contacting HIMEL at the address given below:

Halkin Investments Middle East Limited
610, West Office
Index Tower, DIFC, PO Box - 506885
Dubai , United Arab Emirates

DISCLOSURES TO DATA PROCESSORS AND / OR THIRD PARTIES:

Personal data relating to you which is collected from you or provided by you or on your behalf may be handled by HIMEL or their duly appointed agents, service providers and any of their respective related, associated or affiliated companies for the purposes specified above.

These data processors will handle your information in accordance with applicable Data Protection Legislation.

HIMEL may disclose your personal data to other third parties where required by law or for legitimate business interests. This may include disclosure to third parties such as auditors, regulatory bodies, taxation authorities and technology providers.

TRANSFER OF DATA OUTSIDE DIFC

Personal data collected from you or provided by you or on your behalf may be transferred outside of DIFC for processing including to companies situated in countries which may not have the same data protection laws. Such data transfers will only involve companies which are part of the same corporate group or acting as service providers to HIMEL.

RETENTION PERIOD

HIMEL will retain your personal information for as long as is needed to fulfil the purposes outlined in our Data Protection Policy, unless a longer retention period is required or permitted by law.

SECURITY MEASURES TO PROTECT YOUR DATA

We maintain reasonable and appropriate security measures to protect Customer Data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Our information security controls ensure that personal and financial data is well protected and accessible only to authorised personnel.

YOUR DATA PROTECTION RIGHTS:

Your data protection rights are as under:

- You have a right of access to and the right to amend and rectify your personal data.
- You have the right to have any incomplete personal data completed.
- You have a right to be forgotten (right of erasure of personal data)
- You have a right to restrict processing.
- You have a right to data portability.
- You also have the right to object to processing where HIMEL is processing personal data for legitimate interests.
- You have the right to withdraw your consent used for Direct Marketing

Additionally, you have a right to lodge a complaint with relevant supervisory authority, in the DIFC of the alleged infringement if you consider that the processing of personal data relating to you carried out by HIMEL is not as per the regulation in force.

You may use/enforce your rights as outlined above by submitting your written request to us via:

Data Protection Officer:

Mr. Alexander Jomy
Halkin Investments Middle East Limited
610, West Office
Index Tower, DIFC, PO Box - 506885
Dubai , United Arab Emirates

Or you may email us at:

AJ@Halkinme.com

Refusal to provide personal data:

The provision by you of personal data, as outlined in the section titled “Purposes of processing and lawful basis for processing” is voluntary and required by us to comply with the contractual, tax, legal and regulatory requirements referenced above. Where you refuse to provide such personal data or withdraw your consent, we may not be able to perform the contract we have entered into with you or provide our products and services.

Please note:

- We do not track your online activities across the Internet.
- We do not use your personal information for automated decision making, including profiling.
- We do not sell or rent your personal information to third parties.