



PRIVACY POLICY

VANTAGE GLOBAL FINANCIAL SERVICES L.L.C

DET License No. 1584636 • Registered Office: Level 132, Burj Khalifa, Downtown, Dubai, UAE

Licensed Activity: CMA Category 5 - Introduction and Promotion • CMA License No. 20200000443

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ARTICLE 1: INTRODUCTION

VANTAGE GLOBAL FINANCIAL SERVICES L.L.C (DET License No. 1584636), a company established under the laws of the United Arab Emirates with its registered office at Level 132, Burj Khalifa, Downtown, Dubai, UAE ("**the Company**", "**we**", "**us**", or "**our**"), is dedicated to safeguarding your privacy and maintaining the confidentiality of your personal data.

As a holder of a licence issued by the Capital Market Authority ("**CMA**") of the United Arab Emirates for the conduct of Category 5 regulated activities as an Introducer and Promoter (CMA License No. 20200000443), we are subject to the requirements of applicable UAE legislation, including the Federal Decree Law No. 45 of 2021 on Personal Data Protection ("**PDPL**").

This Privacy Policy outlines the manner in which we gather, utilise, disclose, and protect your personal data in connection with your interactions with our website, digital channels, or promotional activities.

ARTICLE 2: PERSONAL DATA WE COLLECT

During the course of your dealings with the Company, we may collect, process, and retain certain categories of personal data in support of our legitimate business and regulatory functions. The categories of personal data we may gather include the following:

2.1 Contact Information

Full name, email address, telephone number (mobile or landline), and employer or organisational affiliation (where relevant). Such information is ordinarily collected when you complete an enquiry form, subscribe to our communications, or interact with us through promotional materials or digital platforms.

2.2 Identification Details

Emirates ID number, passport number, nationality, and date of birth. This category of data is collected only where voluntarily provided, for instance, during a request to be connected with a third-party financial institution, or for the purpose of verifying eligibility for services limited to specific investor categories.

2.3 Submitted Information

Information furnished through enquiry forms, feedback surveys, event registrations, or content download requests, as well as data pertaining to your investment interests or areas of enquiry. We employ this information to tailor our responses, provide relevant promotional content, and enhance our communications.

2.4 Website and Usage Data

IP address and device identifiers, browser type and version, pages visited and duration of visits, date and time of access, and referring website (where applicable). This data assists us in analysing traffic patterns, monitoring user behaviour, diagnosing technical issues, and refining the user experience on our website.

2.5 Marketing and Communication Preferences

Your preferred communication channel (e.g., email, telephone), consent status for receiving promotional or informational material, and a record of prior interactions (such as email opens, file downloads, and click-through activity). This data is used to manage subscription preferences and to ensure adherence to UAE marketing consent requirements.

2.6 Sensitive Personal Data

We do not deliberately collect or process "special categories" of personal data (sometimes termed sensitive personal data) as delineated by UAE Federal Decree Law No. 45 of 2021, such as health-related data, religious or philosophical convictions, biometric or genetic information, or political opinions.

We request that you refrain from submitting any sensitive personal data via our website, contact forms, or promotional channels. Should such data be provided inadvertently, we will take appropriate steps to securely delete it unless retention is mandated by law.

ARTICLE 3: HOW WE USE YOUR PERSONAL DATA

Your personal data is processed in accordance with applicable UAE data protection legislation and strictly within the parameters of our licensed activities under the CMA as an Introducer and Promoter. We process your personal data for the following lawful purposes:

3.1 Responding to Enquiries and Information Requests

We may use your personal data, including contact details and message content, to address enquiries, information requests, and general correspondence received through our website, email, or marketing campaigns. This may involve furnishing details about regulated financial products and services offered by licensed third-party institutions, educational materials, events or webinars, and the scope of our regulatory role and introduction services.

3.2 Facilitating Introductions to Licensed Third Parties

As an entity licensed by the CMA under Category 5, we are permitted to introduce prospective clients to financial institutions that are themselves subject to the oversight of competent

regulatory authorities. We may utilise your submitted personal data to gauge your interest, qualify your request, and arrange contact with the appropriate licensed third-party provider. All such introductions are conducted on a strictly non-advisory basis, in line with your consent and expressed preferences.

3.3 Managing Communications and Client Records

We may process your data in order to maintain precise and current records of your communication preferences, consent status, and engagement history. This supports our regulatory compliance efforts and enables us to deliver relevant, timely updates aligned with your stated interests.

3.4 Website Analytics and User Experience Optimisation

We may use anonymised and/or pseudonymised usage data (including IP address, device type, and session behaviour) to monitor website performance and functionality, identify and resolve technical issues, examine user behaviour and navigation trends, and refine the structure, design, and content of our website and communication tools.

3.5 Legal and Regulatory Compliance

We may process your personal data as required to fulfil our obligations under UAE laws and regulations (including those promulgated by the CMA and the UAE Central Bank), respond to legitimate requests or enquiries from public authorities, and maintain adequate records for compliance, audit, or inspection purposes. This encompasses compliance with Know Your Client (KYC), Anti-Money Laundering (AML), and marketing consent documentation requirements, where applicable.

3.6 What We Do Not Do

- We do not render investment advice, portfolio management, or financial planning services.
- We do not process transactions, execute trades, or manage client funds or financial accounts.
- We do not employ your data for automated decision-making or to profile you for investment suitability.
- We do not sell, lease, or commercially exploit your personal data.

All data processing activities are carried out transparently, proportionately, and with your informed consent where this is required.

ARTICLE 4: LEGAL BASIS FOR PROCESSING

Our processing of your personal data is conducted in strict conformity with the principles and requirements of the PDPL and other applicable regulatory obligations issued by the CMA. We process personal data only where a lawful and legitimate basis exists to do so.

4.1 Your Consent

In certain circumstances, we process your personal data on the basis of your explicit consent, for example, when you subscribe to our marketing communications or newsletters, submit enquiries or personal details through contact forms, or request an introduction to a third-party financial institution.

You may revoke your consent at any time by contacting us using the details set out in this Privacy Policy. The withdrawal of consent shall not affect the lawfulness of any processing undertaken prior to such withdrawal, and it may restrict our ability to provide you with certain information or services going forward.

4.2 Legitimate Interests

We may process your data where necessary to pursue our legitimate interests, provided those interests do not override your fundamental rights and freedoms. Such interests include conducting CMA-authorised promotional activities, enhancing user experience through website analytics and performance monitoring, maintaining communication records and improving service quality, and safeguarding our legal rights, business operations, and website security.

4.3 Compliance with Legal Obligations

In some cases, we are obliged to process your personal data in order to meet our legal and regulatory duties as a UAE-licensed entity - including maintaining accurate records for regulatory audit or inspection, demonstrating compliance with CMA regulations or UAE federal laws, and responding to lawful requests from authorities in connection with anti-money laundering (AML), counter-terrorism financing (CTF), or marketing consent regulations. Where the law so requires, we may retain or disclose certain data even in the absence of your explicit consent, in accordance with applicable data protection legislation.

ARTICLE 5: DISCLOSURE TO THIRD PARTIES

We treat the confidentiality of your personal information with the utmost seriousness and are committed to handling it responsibly and transparently. The Company will share your personal data only in a controlled and limited manner, and only where there is a genuine need to do so.

5.1 Licensed Financial Institutions

We may share your personal information with third-party financial institutions or service providers that are duly licensed and supervised by the CMA, the Central Bank of the UAE, or other competent financial regulators, and which are introduced to you solely with your consent or at your request for the purpose of exploring relevant financial services or products. Such institutions operate as independent data controllers and will handle your information in accordance with their own privacy and compliance frameworks.

5.2 Authorised Third-Party Service Providers

We may engage external service providers to assist in operating and improving our business, including providers of digital marketing and advertising services, website analytics and

performance monitoring, and IT hosting, infrastructure, and cloud-based solutions. All such third parties are bound by strict confidentiality and data protection agreements, ensuring that your personal data is processed solely for the designated purpose and in compliance with applicable UAE data legislation.

5.3 Legal, Regulatory, and Government Authorities

We may disclose your personal data to governmental, supervisory, or regulatory bodies where required to comply with a legal obligation, court order, or official directive; respond to a request from law enforcement or a supervisory authority (such as the CMA or the Central Bank of the UAE); demonstrate adherence to marketing regulations, consent protocols, or AML requirements; or protect our legal rights or prevent misuse of our platform. Any such disclosure is restricted to what is legally necessary and is conducted with due regard for your rights and confidentiality.

5.4 No Sale or Commercialisation of Data

We do not sell, rent, trade, or otherwise make available your personal data for commercial gain to any third party. Your data is not used for unsolicited marketing, data brokerage, or unauthorised profiling. We endeavour at all times to ensure that any third party to which your data is disclosed maintains data protection and security standards equivalent to those required under UAE Federal Decree Law No. 45 of 2021 and applicable regulatory standards.

ARTICLE 6: CROSS-BORDER TRANSFERS

Although the Company processes personal data primarily within the United Arab Emirates, certain operational, technical, or regulatory requirements may necessitate the transfer of your personal data to recipients located outside the UAE, such as cloud service providers or IT infrastructure vendors based in other jurisdictions, licensed financial institutions or third-party partners with international operations, or data processors or affiliates providing analytics, security, or support services on our behalf.

Wherever your personal data is transferred across borders, we take all necessary measures to ensure that such transfers comply with the PDPL and relevant regulatory guidance. These measures may include verifying that the receiving country affords an adequate level of data protection as determined by the UAE Data Office, entering into data transfer agreements or standard contractual clauses with the receiving party, requiring the recipient to implement appropriate technical and organisational safeguards, and restricting the scope of data shared to what is strictly necessary for the specified purpose.

No transfer of your personal data will expose your information to undue risk. We remain accountable for ensuring that your data is protected regardless of where it is stored or processed, and you retain the full range of rights afforded to you under the PDPL, including the right to request details about how and where your personal data is stored or transferred.

ARTICLE 7: DATA RETENTION

We retain your personal data only for so long as is necessary to fulfil the specific purposes for which it was collected, as described in this Privacy Policy, or as required to satisfy our legal, regulatory, contractual, or audit obligations under UAE law.

The period for which personal data is held may vary according to the nature of the interaction or service, the type of data concerned, and the legal or regulatory requirements imposed by the CMA or other competent UAE authorities.

As a general rule, personal data gathered for communication or marketing purposes will be held for as long as you maintain an active relationship with us or until you withdraw your consent. Personal data processed in connection with regulatory obligations may be retained for a longer duration, in accordance with statutory retention periods prescribed by UAE law or applicable financial regulations.

When retention is no longer warranted, we will ensure that your personal data is securely deleted, anonymised, or archived in a manner that prevents unauthorised access, use, or disclosure.

ARTICLE 8: YOUR RIGHTS

Subject to the provisions of Federal Decree Law No. 45 of 2021 on the PDPL and any applicable guidance issued by the UAE Data Office or the CMA, you may exercise certain rights in relation to your personal data:

- **Right of Access:** you may obtain confirmation as to whether we hold personal data about you and request a copy of that data, together with information on how it is being processed.
- **Right of Correction or Update:** you may ask us to rectify or update any inaccurate, incomplete, or outdated personal information in our possession.
- **Right to Withdraw Consent:** where processing is based on your consent, you may withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing carried out before the withdrawal.
- **Right of Erasure:** you may request deletion of your personal data in certain circumstances. This right is subject to applicable legal and regulatory exceptions, including data retention obligations under UAE law.
- **Right to Object:** you may object to certain forms of processing, in particular where we rely on legitimate interests and where your fundamental rights and freedoms prevail over those interests.

How to Exercise Your Rights

To exercise any of the rights described above, please contact us at:

[complaints.uae@vantagemarkets.com]

To assist in verifying your identity and protecting your data, we may ask you to provide additional information such as proof of identity (e.g., passport, Emirates ID, or other valid documentation). We aim to respond to valid requests within the timeframes stipulated by applicable law.

ARTICLE 9: COOKIES AND TRACKING TECHNOLOGIES

We utilise cookies and comparable technologies to enhance user experience and site navigation, analyse website traffic and performance, and retain user preferences (e.g., language settings). You may manage your cookie preferences through your browser settings. Disabling certain cookies may affect your browsing experience. For full details, please refer to our Website Terms of Use and Cookie Policy.

ARTICLE 10: DATA SECURITY

We deploy comprehensive administrative, technical, and organisational measures to protect your personal data against unauthorised access, disclosure, alteration, or destruction. These measures encompass data encryption, secure access controls, intrusion detection systems, routine system monitoring, and staff awareness training. We enforce strict access restrictions to ensure that only authorised personnel have access to personal data, and we work with trusted service providers under confidentiality agreements.

Although we adhere to industry best practices and comply with UAE data protection laws, no system can be rendered entirely free from risk. In the unlikely event of a data breach that affects your rights, we will inform you and the relevant authorities in accordance with legal requirements.

ARTICLE 11: EXTERNAL LINKS

Our website may contain links to third-party websites, platforms, or services that are neither operated nor controlled by the Company. This Privacy Policy applies solely to our own website and data processing activities. We accept no responsibility or liability for the privacy practices, data protection standards, content, or policies of external sites. We strongly recommend that you review the privacy and cookie policies of any third-party website before providing your personal information or engaging with their services.

ARTICLE 12: CONSENT

By using our website or engaging with our services, you confirm that you have reviewed and understood this Privacy Policy, and you expressly consent to the collection, use, processing, and disclosure of your personal data in accordance with its terms. Your continued use of our platform constitutes acceptance of any updates to this policy.

ARTICLE 13: CHANGES TO THIS POLICY

We may revise this Privacy Policy from time to time in order to reflect changes in legal, regulatory, or operational requirements, or to ensure continued transparency in our handling of

your personal data. Any amendments will be published on our website, with the effective date clearly indicated at the top of the policy. We encourage you to review this Privacy Policy regularly to remain informed about how we protect your information. Your continued use of our website or services following the publication of any updates will constitute your acknowledgement and acceptance of the revised terms.

— *End of Privacy Policy* —