



GMG (Dubai) Limited

Privacy and Data Protection Policy Statement

1. Introduction

This Privacy Notice is published by GMG (Dubai) Limited ("GMG Dubai"), a company incorporated and regulated in the Dubai International Financial Centre ("DIFC") and authorized by the Dubai Financial Services Authority ("DFSA") under Licence No. F001134. GMG Dubai acts as a controller of personal data within the meaning of the DIFC Data Protection Law No. 5 of 2020, as amended, and its associated Regulations (together, the "DIFC DP Law").

This Notice explains how and why GMG Dubai collects, uses, stores, shares, and otherwise processes personal data in connection with its website (www.gmg-brokers.com) and its brokerage services. By accessing this website or providing personal data to GMG Dubai, you acknowledge that you have read and understood this Notice.

2. Data Controller Identity

Controller: GMG (Dubai) Limited

Registered Address: Dubai International Financial Centre, Dubai, United Arab Emirates

Regulatory Reference: DFSA Licence No. F001134

Contact for data protection matters: dataprotection@gmg-brokers.com (OR) info@gmg-brokers.com

GMG Dubai has notified the DIFC Commissioner of Data Protection of its data processing activities as required under Article 14 of the DIFC DP Law. Each GMG Group entity acts as a separate data controller in respect of the personal data it processes.

3. Personal Data We Collect

We collect the following categories of personal data:

- Identity data: full name, date and place of birth, nationality, passport or government-issued identification numbers, photographs.
- Contact data: business and personal email addresses, telephone numbers, postal addresses.
- Professional data: employer, job title, employment history, professional qualifications.
- Financial and KYC data: financial instrument experience, investment risk tolerance, source of funds and wealth, bank account and payment details, credit history, anti-money laundering (AML) and sanctions screening data.
- Correspondence and communications: records of calls (which may be recorded in accordance with regulatory obligations), emails, and other communications with GMG Dubai.
- **Technical data: IP addresses, browser type, operating system, and pages visited on this website (collected in anonymised aggregate form).**
- Special category data: where required to meet legal or regulatory obligations, we may process special category data including health data or criminal conviction data; we process such data only to the extent strictly necessary and with appropriate safeguards.

4. Lawful Basis for Processing

GMG Dubai processes personal data on the following lawful bases under the DIFC DP Law:

- Performance of a contract: where processing is necessary to provide brokerage services to clients or to take pre-contractual steps at the request of a data subject.
- Legal obligation: where processing is required to comply with applicable laws and regulations including, without limitation, DFSA rules, anti-money laundering and counter-terrorism financing legislation (Federal and DFSA requirements), sanctions screening requirements, and tax reporting obligations.
- Legitimate interests: where processing is necessary for GMG Dubai's legitimate business interests, including fraud prevention, risk management, network and information security, and business development, provided such interests are not overridden by the data subject's rights and interests.
- Consent: where we have obtained your explicit consent to process personal data for a specific purpose (e.g., marketing communications). You may withdraw consent at any time by contacting us at dataprotection@gmg-brokers.com (OF) info@gmg-brokers.com.

5. Purpose of Processing

We process personal data for the following purposes:

- Onboarding and Know Your Client (KYC) verification, including identity checks, suitability and appropriateness assessments, and sanctions and politically exposed persons (PEP) screening.



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- Execution, confirmation, and settlement of brokerage transactions and post-trade processing.
- Compliance with DFSA regulatory obligations including transaction reporting, client classification, and record retention.
- Compliance with anti-money laundering, counter-terrorism financing, and sanctions obligations.
- Risk management, fraud prevention, and audit purposes.
- Responding to enquiries submitted through this website's contact form.
- Improving and securing our website and services.

6. Disclosure and International Transfers

GMG Dubai may share personal data with:

- Other entities within the GMG Group of Companies, where necessary for operational, compliance, or risk management purposes, under intra-group data sharing arrangements that comply with the DIFC DP Law;
- Regulators, law enforcement agencies, and government bodies where required or permitted by applicable law;
- Third-party service providers (including compliance technology vendors, cloud hosting providers, and professional advisers) acting as data processors, under written data processing agreements;
- Counterparty banks and financial institutions in connection with brokered transactions;
- Fraud prevention agencies and credit reference agencies as part of AML/KYC obligations.

Where personal data is transferred outside the DIFC to a jurisdiction that has not received an adequacy decision from the DIFC Commissioner of Data Protection, GMG Dubai will ensure that appropriate safeguards are in place, such as standard contractual clauses approved under the DIFC DP Law or another lawful transfer mechanism.

7. Data Retention

GMG Dubai retains personal data only for as long as is necessary for the purposes for which it was collected, subject to applicable regulatory retention requirements. In particular, under DFSA rules, client records are typically retained for a minimum of six (6) years from the date of the relevant transaction or the end of the client relationship, whichever is later. AML records are retained in accordance with applicable UAE and DIFC AML legislation.

8. Your Rights

Subject to the DIFC DP Law, you have the following rights in relation to your personal data:

- Right of access: to obtain a copy of the personal data we hold about you and information about how it is processed.
- Right to rectification: to require us to correct inaccurate or incomplete personal data.
- Right to erasure: to request deletion of your personal data where there is no longer a lawful basis for its retention.
- Right to restriction of processing: to require us to restrict processing pending resolution of an accuracy dispute or objection.
- Right to object: to object to processing based on legitimate interests.
- Right to data portability: to receive personal data in a structured, commonly used, and machine-readable format.
- Right to withdraw consent: where processing is based on consent, to withdraw that consent at any time without affecting the lawfulness of prior processing.

To exercise any of these rights, please contact us at dataprotection@gmg-brokers.com (OR) info@gmg-brokers.com. We will respond within the timeframe prescribed by the DIFC DP Law. If you are dissatisfied with our response, you may lodge a complaint with the DIFC Commissioner of Data Protection.

9. Cookies

This website does not currently deploy tracking, analytics, or advertising cookies. Should this change, this Notice will be updated accordingly and any non-essential cookies will be deployed only with your prior consent.

Changes to This Notice

GMG Dubai may update this Notice from time to time to reflect changes in applicable law or our processing activities. The date of the most recent update is shown below. We recommend that you review this Notice periodically.

Last updated: June 2026