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# Privacy Policy

Website Privacy Notice — GMG Group of Companies

## THE PURPOSE OF THIS PRIVACY NOTICE

### 1. Introduction

This Website Privacy Notice generally covers all visitors to our website, subject to the provisions of our UK/EU, DIFC and Guernsey where applicable. For personal data that is subject to the DIFC Data Protection Law No. 5 of 2020 please refer to our DIFC Privacy notice.

GMG Group of Companies ("**GMG**") is committed to protecting the privacy of all personal information that we obtain from you. Our Privacy Policy explains how and why we collect personal information about you, and how that information is maintained and used ("**Privacy Policy/Notice/Statement**").

### 2. Identity

PLEASE READ THIS PRIVACY STATEMENT/PRIVACY POLICY CAREFULLY. "**YOU**" AND "**YOUR**" SHALL REFER TO THE CUSTOMER OR VENDOR OR VISITOR OF THE "GMG" [www.gmg-brokers.com]. "**WE**," "**OUR**" OR "**US**" SHALL REFER TO GMG Group of Companies, PROVIDING OR OFFERING SERVICES TO YOU OR CUSTOMER OF the GMG Group of Companies. Each such GMG Group of Companies shall have an interest in, take the benefit of, and be bound by these terms and conditions, as applicable.

### 3. Our use of personal information

GMG is committed to protecting the privacy of personal information of our customers which has been provided to us or collected by us when you use our products and services. Our Privacy Statement is designed and developed to understand the privacy and security of customers' personal information.

### 4. This Privacy Notice

This Privacy Notice explains the collection, use, protection, disclosure, sharing and transfer, if any, of "**personal information**" by GMG. GMG reserves its right to amend this Privacy Policy from time to time based on changes as per the business, legal and regulatory requirements and applicable laws and the same shall be updated on this website. You are encouraged to periodically visit this page to review the policy and any changes. By using our website or our products/services or otherwise providing information to us through this website, you consent that your personal information may be used and handled as described in this Privacy Statement.

### 5. What is Personal Information?

Personal information is information that relates to you or allows us to identify you. This includes obvious things like your name, address and telephone number but can also include less obvious things like your

attendance at a board meeting or analysis of your use of our websites.

We may also collect your personal information from third parties, including, for example, business partners, analytics providers, search information providers, credit reference agencies and third-party marketing companies or through publicly available sources.

## 6. Our responsibility to you

We process your personal information in our capacity as a controller. This means that we are responsible for ensuring that we comply with relevant data protection laws when processing your personal information.

If you are a client/services provider/applicant of our UK Company the relevant data controller is the GMG legal entity with whom you are dealing with. If you contract with our UK Company in any other capacity, your data controller will be the GMG entity with which you contract.

If you are a client/services provider/applicant of our DIFC Company the relevant data controller is the GMG legal entity with whom you are dealing with. If you contract with our DIFC Company in any other capacity, your data controller will be the GMG entity with which you contract.

## 7. Why are we collecting personal information about you?

We only collect personal information about you in connection with providing our services and running our business. We will hold information about you if:

- you are a client, a representative of a client, or the beneficial owner of a client
- your information is provided to us by a client or others
- you provide services to us
- you are an applicant for a job with us

## 8. What personal information do we collect about you?

**Individual details:** Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you.

**Identification details:** Identification numbers issued by government bodies or agencies, such as your national insurance number, passport number, tax identification number and driving license number, biographical data and, where applicable, your photograph, utility bills.

**Financial information:** Bank account or payment card details, investment risk tolerance, financial investment experience income or other financial information.

**Credit, anti-fraud and sanctions data:** Credit history and information received from various anti-fraud and sanctions databases relating to you.

**Sensitive personal data:** Information about your health, racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership; your genetic and biometric data; and information about your sex life or sexual orientation.

**Identifiers:** Information which can be traced back to you, such as an IP address, a website tracking code or electronic images of you.

**Contacts with GMG:** A note or recording of a call you make to one of our contact centers, an email or letter you send to us and other records of any contact you have with us.

## 9. Where do we collect your personal information from?

We collect your personal information from various sources, including: you; your employer; our clients and our service providers; other third parties; anti-fraud databases and other databases; government agencies and publicly accessible registers or sources of information; by actively obtaining your personal information ourselves, for example through the use of website tracking devices.

Which of the sources apply to you will depend on why we are collecting your personal information. Where we obtain your information from a third party, in particular your employer or our client, we may ask them to provide you with a copy of this privacy notice (or a shortened version of it) to ensure you know we are processing your information and the reasons why.

## 10. How do we use your personal information?

**Know Your Client and other legal obligations.** We may hold information relating to you that you have provided to us on KYC AND SUITABILITY ASSESSMENT QUESTIONNAIRE — CORPORATE/LEGAL ENTITIES or KYC AND SUITABILITY ASSESSMENT QUESTIONNAIRE — INDIVIDUALS or that we may have obtained from another source such as our suppliers or from marketing organizations and credit agencies. We may also collect your personal information when you use our services, websites or otherwise interact with us during the course of our relationship. As an investment service provider, we (GMG) are subject to various legal obligations, i.e. legal requirements as well as supervisory requirements. The purposes of the processing include identity and age checks, KYC process, prevention of fraud and money laundering, the fulfillment of reporting obligations as well as the evaluation and management of risks within the company.

**Contractual obligations.** The processing of data is carried out to provide and mediate financial services, as part of the execution of our contracts with our customers or to carry out pre-contractual actions, which are carried out on request. The purposes of data processing are primarily based on the specific agreement. We are a regulated inter-dealer brokerage firm. We have a legitimate interest in using your information where this is necessary or appropriate to provide services to our clients, through the performance of contractual obligations.

**Service providers.** We collect information about you in connection with your provision of services to us or your position as a representative of a provider of services to us. We do not generally look to collect sensitive personal data for this purpose, other than where we are required to do so to meet our legal obligations.

**Visitors to our websites.** A facility on our website invite you to provide us with your personal information. Where you provide us with information, we will only use it for the purpose for which it has been provided by you. We may use cookies and other interactive techniques to collect personal and non-personal information about you.

**Visitors to our offices.** We have security measures in place at our offices, which include building access controls and finger print access for employees. The company building requires visitors to sign in at reception and provide an ID.

**Staff Recruitment.** We ask you to provide or we receive personal information pertaining to yourself from qualified recruitment agencies as part of the recruitment process. We will also conduct checks in order to verify your identity and the information in your application, and obtain further information about your suitability for a role within our company.

## 11. Consent

We process your Personal Information only when there is a lawful basis. In some instances, we have to process your personal information without your consent, provided that there is a determined legal ground. In cases where you have to give consent to the Processing of your Personal Data for specific purposes, you shall have the right to withdraw this consent at any time. To withdraw your consent please email us at mohamed.hafit@gmg-brokers.com or, to stop receiving our marketing emails or company news, please click on the unsubscribe link in the relevant email you receive from us.

## 12. Do we share your information with anyone else?

We do not sell your information nor make it generally available to others. But we do share your information with the following parties or in the circumstances set below:

**Authorized Third Parties:** GMG may at its discretion employ, contract or include third parties external to itself for strategic, tactical and operational purposes. We may disclose and/or transfer your personal information or other information collected, stored and processed by us to such third parties. Such third parties though external to GMG, will always be entities which are covered by contractual agreements. Authorized third-parties include our subsidiaries, divisions, and third-party business affiliates including: Partners or agents who are involved in delivering the products and services you have ordered or used; Customer Verification agencies; Credit-reference agencies, fraud-prevention agencies; Debt-collection agencies; Business partners involved in delivering and improving our services; IT vendors hosting our websites and applications.

**Government Agencies:** GMG may also share your personal information with Government agencies or other authorized law enforcement agencies (LEAs) mandated under law to obtain such information for the purpose of verification of identity or for prevention, detection, investigation including but not limited to cyber incidents, prosecution, and punishment of offences.

**Data Analytics:** We may permit certain authorized third parties to track your usage, and analyze your personal data. Data Analytics is performed in order to better understand our products and services usage, and enhance them by helping us make better decisions.

**Other Scenarios:** We may transfer personally data as an asset in connection with a merger or sale (including any transfers made as part of an insolvency or bankruptcy proceeding) involving all or part of our business or as part of a corporate reorganization, stock sale or other change in control.

## 13. Keeping your personal information safe

We adopt reasonable security practices and procedures, in line with international standard IS/ISO/IEC 27001, to include technical, operational, managerial and physical security controls in order to protect your personal information from unauthorized access or disclosure while it is under our control.

- To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we maintain appropriate physical, electronic, and managerial procedures to safeguard and secure the information and data stored on our system.
- We have specialized security teams who constantly review and improve our measures to protect your personal information from unauthorized access, accidental loss, disclosure or destruction.
- Our security practices and procedures limit access to personal information on a need to know basis.
- When we dispose of your personal information, we use reasonable procedures to erase it or render it unreadable.
- No data transmission over the Internet is completely secure and for reasons outside of our control, security risks may still arise. Any personal information transmitted to us or from our online products or

services will therefore be at your own risk.

## **14. Profiling and automated decision making**

We do not use profiling (where an electronic system uses personal information to try and predict something about you) or automated decision making (where an electronic system uses personal information to make a decision about you without human intervention).

## **15. How long do we keep your personal information?**

We do not keep your personal information forever. We keep your personal information in accordance with our data retention schedule which categorizes all of the information held by us and specifies the appropriate retention period for each category of information. Those periods are based on the requirements of relevant data protection laws and the purpose for which the information is collected and used, taking into account legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice and our business purposes.

Kindly note that once our relationship with you has ended, your Personal Information may still be relevant for our current or future legitimate business purposes. For example we may be required to retain certain Personal Information: (i) for our business records; (ii) to be able to establish, exercise or defend our legal rights; (iii) to show that we are compliant with applicable laws; or (iv) to show that we have fulfilled or continue to fulfill our obligations towards our Clients in relation to Services you may have been involved in.

## **16. Cross border transfers of your personal information**

GMG is an inter-dealer brokerage firm operating throughout the GCC, MENA, and Emerging Market regions, facilitating deals on behalf of its diverse client base, consisting of a vast majority of the world's largest banks, investment banks, hedge funds, and investment firms.

The global nature of our business means that your personal information may well be transferred intra-group and across national boundaries, including, potentially, to countries that do not require organizations by law to look after your personal information in the way in which you have come to expect in your own country.

Where we transfer your personal information across national boundaries, we will protect your personal information by ensuring that those transfers are made in compliance with all relevant data protection laws. Generally, this means where we transfer your personal information to a third party that is located in a country which does not have adequate privacy protection, we will put in place a contract with the third party that includes the standard international data transfer contractual terms approved by the European Commission/UK GDPR or contractual terms compliant with the DIFC Data Protection Law.

If you would like further details of how your personal information is protected when transferred from one country to another then please email us at [mohamed.hafit@gmg-brokers.com](mailto:mohamed.hafit@gmg-brokers.com).

## **17. Contacting us and your rights**

If you have any questions in relation to our use of your personal information, please email us at [mohamed.hafit@gmg-brokers.com](mailto:mohamed.hafit@gmg-brokers.com). Under certain conditions, you may have the right to require us to:

- provide you with further details on the use we make of your personal information.
- provide you with a copy of the personal information we hold about you.
- update any inaccuracies in the personal information we hold about you.

- delete any of your personal information that we no longer have a lawful ground to use.
- where processing is based on consent, stop that particular processing by withdrawing your consent.
- object to any processing based on our legitimate interests unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights.
- restrict how we use your personal information whilst a complaint is being investigated.
- transfer your personal information to a third party in a standardized machine-readable format.

We are obliged to keep your personal information accurate and up to date. Please help us to do this by advising us of any changes to your personal information.

## **18. Your right to complain**

If you are not satisfied with our use of your personal information or our response to any request by you to exercise your rights, or if you think that we have breached any relevant data protection laws, then you have the right to complain to the authority that supervises our processing of your personal information or, where you are based in the EU, the data protection authority in your country. You may also contact the Information Commissioner's Office in the UK if the Data Breach relates to our UK-based Company. If you are unsure of the authority that supervises our processing of your personal information then please email us at [mohamed.hafit@gmg-brokers.com](mailto:mohamed.hafit@gmg-brokers.com).