

Data Privacy Notice

1 Overview

Company Name: Aljazira Capital

Commercial Registration No. 1010351313

Registered Address: Head Office: King Fahad Road 7766, Ar Rahmaniya Dist. 4030, Riyadh 12343, Saudi Arabia

This Privacy Notice explains how Aljazira Capital (“AJB”, “we”, “us”, or “our”), acting as the Data Controller, collects, uses, stores, shares, transfers, and otherwise processes your personal data when you interact with our website, applications, products, services, or otherwise engage with us. We are committed to handling personal data in a transparent, secure, and responsible manner in accordance with the Personal Data Protection Law (“PDPL”) of the Kingdom of Saudi Arabia and its implementing regulations.

This Privacy Notice also explains:

- the categories of personal data we collect;
- the purposes for which personal data is processed;
- the legal bases for processing;
- how we protect and retain personal data;
- when personal data may be shared with third parties; and
- the rights available to data subjects and how such rights may be exercised.

We implement appropriate technical, organizational, and administrative safeguards to protect personal data against unauthorized access, disclosure, alteration, loss, or misuse.

2 Abbreviations

AJB	Aljazira Capital
PDPL	Personal Data Protection Law
CMA	Capital Market Authority
IP	Internet Protocol

3 Definitions

Unless the context requires otherwise, the following terms used in this Privacy Notice shall have the meanings set out below:

- **Personal Data:** Any information relating to an identified individual or an individual who may be identified directly or indirectly..
- **Processing:** Any operation performed on Personal Data by any means, whether manual or automated, including collection, recording, storage, organization, structuring, modification, use, disclosure, transfer, sharing, retrieval, consultation, linking, blocking, erasure, or destruction.

- **Sensitive Data:** Personal Data revealing racial or ethnic origin, religious, intellectual or political beliefs, security or criminal data, biometric or genetic data used for identification purposes, health data, and data indicating that one or both parents of an individual are unknown.
- **Controller:** Any public entity, natural person, or private legal entity that determines the purpose and means of Processing Personal Data, whether independently or jointly with others.
- **Processor:** Any public entity, natural person, or private legal entity that processes Personal Data on behalf of the Controller.
- **Data Subject:** The individual to whom the Personal Data relates.
- **PDPL:** The Personal Data Protection Law issued in the Kingdom of Saudi Arabia and its implementing regulations.

4 Purpose

This Privacy Notice explains how we collect, use, process, store, disclose, and protect Personal Data in connection with our business activities, products, services, website, applications, and interactions with clients, prospective clients, and other individuals.

This Privacy Notice should be read together with any other privacy notices, consent statements, or regulatory disclosures that we may provide on specific occasions when we collect or process Personal Data, so that you are fully informed about how and why your Personal Data is used.

5 Controller and Processor

AJB is a subsidiary of Bank Aljazeera and is headquartered in the Kingdom of Saudi Arabia. AJB is regulated by the Capital Market Authority (CMA)) under CMA license Number 07076-37. For the purposes of the PDPL, AJB generally acts as the Controller of Personal Data, as it determines the purposes and means of Processing Personal Data in connection with its business activities, products, and services.

In certain circumstances, AJB may also act as a Processor when Processing Personal Data on behalf of another Controller and in accordance with applicable contractual, regulatory, or legal requirements.

6 Personal Data

We may collect and process Personal Data relating to you when we interact with you as an individual or as a representative of a client, corporate entity, trust, charity, intermediary, service provider, or other organization.

The categories of Personal Data that we may collect, use, store, transfer, or otherwise process include:

- **Identification Data:** including name, date of birth, place of birth, nationality, national identification number, country of residence, passport details, visa details, tax identification details, and photographs.
- **Contact Data:** including residential or postal address, telephone number, mobile number, email address, and emergency contact details.
- **Family Data:** including marital status and dependent information.
- **Financial, Investment and Regulatory Data:** including bank account details, source of wealth, source of funds, income details, assets, liabilities, investment experience, investment objectives, transaction history, trading activities, credit information, regulatory classification information, and other financial or regulatory information required for compliance, onboarding, business, or legal purposes.
- **Professional Data:** including employer details, job title, employee identification number, business interests, and professional background.
- **Technical Data:** including IP address, device information, browser type and version, operating system, time zone settings, login information, and other technology-related information collected through our website, applications, or online platforms.
- **Usage and Profile Data:** including preferences, interests, feedback, survey responses, website usage information, and interactions with our digital platforms and services.
- **Trading Platform Data:** including transaction details, login activity, device information, location data, IP address, and online trading activity relating to the use of our electronic trading platforms and systems.
- **Sensitive Data:** including Personal Data relating to criminal convictions and offences, biometric data used for identification purposes, health data, and other Sensitive Data permitted to be processed under applicable laws and regulations.

We may process Sensitive Data only where permitted or required under applicable laws, regulatory requirements, or with your explicit consent where required.

Where consent is relied upon as a legal basis for Processing, you have the right to withdraw your consent at any time, subject to applicable legal or regulatory limitations. Withdrawal of consent may affect our ability to provide certain products, services, or maintain the business relationship where Processing is necessary for regulatory, contractual, or operational purposes.

Please note that failure to provide certain Personal Data may limit our ability to establish or continue a business relationship with you, satisfy regulatory onboarding and compliance requirements, provide products or services, comply with applicable legal and regulatory obligations, or enable access to certain systems, platforms, or services.

7 Sources of Personal Data

We may collect Personal Data directly from you through various channels, including when you:

- apply for or use our products or services through our website, mobile applications, electronic trading platforms, telephone communications, or through direct interactions with our employees or representatives;
- submit information, forms, documents, or correspondence to us electronically, physically, or through any other communication channels; and/or
- access or use our websites, applications, platforms, or systems, where certain technical information may be collected automatically, including IP address, device information, browser information, and usage data.
- We may also obtain Personal Data indirectly from third parties or external sources, including:
 - affiliated entities, intermediaries, introducers, professional advisers, service providers, credit bureaus, public sources, regulatory authorities, or other third parties;
 - where another person or entity provides information to us in connection with a joint account, investment, transaction, guarantee, security arrangement, or business relationship involving you;
 - where Personal Data is provided to us on behalf of a corporate entity, trust, charity, investment vehicle, or other organization with which you are associated;
 - where we conduct due diligence, identity verification, fraud prevention, anti-money laundering, sanctions screening, credit, regulatory, or compliance checks during onboarding or throughout the course of our relationship with you; and/or
 - where you interact with our marketing campaigns, events, websites, platforms, or third-party communication channels and request information regarding our products or services.

Where your Personal Data is provided to us by a third party, such party is responsible for ensuring that it has the legal authority and any required permissions to share your Personal Data with us.

8 Purposes and Legal Bases for Processing Personal Data

We process Personal Data for specific and legitimate purposes and in accordance with the applicable laws and regulations in the Kingdom of Saudi Arabia, including the PDPL and the regulatory requirements applicable to the Capital Market institutions regulated by the CMA.

The table below sets out the purposes for which we process Personal Data and the applicable legal bases for such Processing.

Processing Activities	Purpose of the processing	Legal Basis
Client onboarding and account opening	To verify your identity, establish a business relationship, create and administer accounts, and provide access to our products, services, platforms, and systems.	Compliance with legal and regulatory obligations.

Declined applications and onboarding decisions	To maintain records relating to declined applications, onboarding assessments, eligibility determinations, and related regulatory or compliance decisions.	Compliance with legal and regulatory obligations.
Know Your Customer (KYC), due diligence, and AML/CFT compliance	To verify identity, perform customer due diligence, sanctions screening, fraud prevention, anti-money laundering and counter-terrorist financing checks, targeted financial sanctions and comply with applicable regulatory obligations.	Compliance with legal and regulatory obligations.
Suitability and appropriateness assessments	To assess your investment profile, financial position, investment objectives, experience, and risk appetite in order to determine the suitability or appropriateness of products and services.	Compliance with legal and regulatory obligations.
Credit and financial assessments	To assess financial standing, creditworthiness, source of funds, source of wealth, and financial eligibility in connection with products and services.	Compliance with legal and regulatory obligations.
Relationship management and client communications	To communicate with you regarding accounts, transactions, requests, updates, inquiries, complaints, support services, and ongoing relationship management activities.	Performance of contractual obligations.
Account administration and transaction management	To manage accounts, trading activities, transactions, settlements, reconciliations, fees, reporting, notices, statements, and operational activities relating to our services.	Performance of contractual obligations; compliance with legal and regulatory obligations.
Business operations, governance, and audit	To manage business operations, internal administration, accounting, reporting, governance, risk management, monitoring, compliance, and audit activities.	Compliance with legal and regulatory obligations.
Fraud prevention, investigations, and legal claims	To investigate suspected fraud, misconduct, security incidents, regulatory breaches, complaints, disputes, or legal claims, and to protect our legal rights and interests.	Compliance with legal and regulatory obligations; legitimate interests.
Marketing and client engagement	To provide information regarding products, services, events, insights, surveys, and other marketing communications that may be of interest to you, where permitted under applicable laws and regulations.	Consent, where required.
Regulatory reporting and disclosures	To comply with requests, directions, reporting obligations, or disclosures required by regulatory authorities, governmental entities, courts, or law enforcement authorities.	Compliance with legal and regulatory obligations.
Recruitment and employment applications	To assess applications, evaluate candidates, conduct recruitment processes, communicate with applicants, and manage hiring-related activities.	Taking steps prior to entering into an employment contract; compliance with legal and regulatory obligations where applicable.
Exercising data subject rights	To respond to requests made by Data Subjects in connection with their rights under applicable data protection laws and regulations.	Compliance with legal and regulatory obligations.

Retention and record keeping	To retain records, documents, communications, and Personal Data in accordance with applicable legal, regulatory, compliance, operational, and internal record retention requirements.	Compliance with legal and regulatory obligations.
International investments and third-party services	To facilitate investments, transactions, custody arrangements, brokerage services, or access to international financial products, markets, systems, and external service providers located inside or outside the Kingdom of Saudi Arabia.	Performance of contractual obligations; compliance with legal and regulatory obligations.

We will only process Personal Data for the purposes for which it was collected, unless we reasonably determine that additional Processing is compatible with the original purpose and permitted under applicable laws and regulations.

Where required by applicable laws or regulations, we will notify you and obtain any necessary consent before Processing Personal Data for additional purposes.

9 Legal Basis for Processing Your Personal Data

We process Personal Data only where we have a valid legal basis under the applicable laws and regulations of the Kingdom of Saudi Arabia, including the PDPL.

Depending on the nature and purpose of the Processing activity, we may rely on one or more of the following legal bases:

- your consent, where required;
- compliance with legal and regulatory obligations applicable to us as a Capital Market institution regulated by the CMA;
- the performance of contractual obligations or taking steps prior to entering into a contract with you;
- the protection of vital interests where it is impractical or impossible to obtain consent; and/or
- legitimate interests pursued by AJB, provided that such Processing does not adversely affect your rights or interests.

Where Processing is based on consent, you may withdraw your consent at any time, subject to applicable legal or regulatory restrictions.

10 Disclosure of Personal Data

We may disclose or share Personal Data with third parties where necessary for legitimate business purposes, the provision of our products and services, compliance with legal and regulatory obligations, or as otherwise permitted or required under applicable laws and regulations.

Such third parties may include:

- affiliated entities within our group;
- regulatory authorities, governmental entities, courts, law enforcement authorities, judicial bodies, or other competent authorities;
- financial institutions, custodians, brokers, market counterparties, payment service providers, and other financial market participants;
- credit bureaus, fraud prevention agencies, identity verification providers, and compliance screening providers;
- professional advisers, including legal advisers, auditors, consultants, accountants, and external compliance providers;
- technology service providers, cloud service providers, system vendors, and outsourced operational or administrative service providers; and/or
- other third parties where disclosure is necessary in connection with the establishment, exercise, or defense of legal rights or claims.

We may also disclose Personal Data in connection with an actual or proposed merger, acquisition, restructuring, financing transaction, transfer of business, or sale of assets, in which case Personal Data may be transferred to the relevant third party involved in such transaction.

Where required under applicable laws and regulations, we will implement appropriate safeguards and contractual protections to ensure that Personal Data shared with third parties is processed securely, confidentially, and in accordance with applicable data protection requirements.

We do not permit third parties processing Personal Data on our behalf to use such Personal Data for their own independent purposes, except where permitted or required under applicable laws and regulations.

11 International Transfers of Personal Data

In connection with our business activities and the provision of financial products and services, Personal Data may be transferred to, stored in, processed in, or accessed from jurisdictions outside the Kingdom of Saudi Arabia.

Such transfers may occur where necessary for purposes including, but not limited to:

- facilitating international investment activities, trading services, custody arrangements, settlement services, or financial transactions;
- engaging with international financial institutions, brokers, custodians, counterparties, market operators, or service providers;
- obtaining technology, cloud computing, operational, administrative, compliance, cybersecurity, or professional support services; and/or
- complying with applicable legal, regulatory, judicial, or supervisory requirements.

Where Personal Data is transferred outside the Kingdom of Saudi Arabia, we will implement appropriate safeguards and measures in accordance with the PDPL and other applicable laws and regulations to ensure that Personal Data remains adequately protected.

12 Marketing Communications

We may use your Personal Data to send you information regarding our products, services, investment opportunities, market insights, events, surveys, updates, and other marketing or promotional communications where permitted under applicable laws and regulations.

Marketing communications may be delivered through various channels, including email, telephone calls, SMS, mobile applications, electronic platforms, or other communication methods.

Where consent is required under applicable laws or regulations, we will obtain your consent before sending marketing communications. You may withdraw your consent or opt out of receiving marketing communications at any time by following the unsubscribe instructions included in the communication or by contacting us using the contact details provided in this Privacy Notice.

Please note that withdrawing your consent or opting out of marketing communications will not affect service-related, transactional, regulatory, compliance, security, or other non-marketing communications that we are required or permitted to send to you.

13 Data Security

We implement appropriate technical, organizational, administrative, and physical security measures designed to protect Personal Data against unauthorized access, disclosure, misuse, loss, alteration, destruction, or any other form of unlawful Processing.

Access to Personal Data is restricted to authorized employees, representatives, contractors, service providers, and other third parties who require access for legitimate business, operational, legal, regulatory, or compliance purposes and who are subject to confidentiality obligations.

We maintain policies, procedures, governance controls, and security practices intended to safeguard Personal Data and manage information security risks in accordance with applicable legal, regulatory, and operational requirements.

We also maintain procedures for identifying, investigating, managing, and responding to actual or suspected Personal Data breaches or security incidents. Where required under applicable laws and regulations, including the PDPL, we will notify the competent authorities and affected individuals in accordance with the applicable legal and regulatory requirements.

14 Data Retention and Storage

We retain Personal Data only for as long as necessary to fulfil the purposes for which it was collected, including for legal, regulatory, compliance, contractual, operational, accounting, reporting, audit, dispute resolution, and record-keeping purposes.

Retention periods may vary depending on the nature of the Personal Data, the services provided, applicable legal and regulatory requirements, and our legitimate business needs.

When Personal Data is no longer required, we will securely delete, destroy, anonymize, or dispose of such Personal Data in accordance with applicable laws, regulations, and our internal record retention and information security requirements.

Personal Data may be stored and processed through systems, applications, platforms, cloud environments, or other technologies operated by us or by authorized third-party service providers, subject to appropriate security and confidentiality safeguards.

15 Social Media

AJB may operate official accounts, channels, or pages on social media platforms for communication, engagement, informational, marketing, and customer service purposes.

Please note that social media platforms are public or third-party environments and may not be appropriate for sharing confidential, sensitive, financial, investment, or account-related information.

You should not share or disclose through social media channels any:

- account credentials, passwords, verification codes, or login information;
- financial, investment, trading, transaction, or account-related information;
- Sensitive Data or confidential Personal Data; or
- unlawful, offensive, inappropriate, defamatory, or misleading content.

AJB may monitor, review, retain, and respond to communications, comments, messages, or interactions made through its official social media channels for customer service, quality assurance, security, compliance, legal, regulatory, training, and operational purposes.

Except for content officially published by AJB or its authorized representatives, AJB does not control or endorse content published by third parties on social media platforms.

16 Cookies and Similar Technologies

We may use cookies and similar technologies on our websites, applications, and digital platforms to support functionality, security, analytics, performance, and user experience.

These technologies may collect certain technical and usage information, including device information, browser information, IP address, preferences, and website interaction data.

You may manage or disable cookies through your browser or device settings. However, disabling certain cookies may affect the functionality or availability of certain features or services.

Further information regarding the cookies and similar technologies we use is set out in the applicable Cookie List or Cookie Notice made available through our website or digital platforms.

Cookie Name	Retention Period	Purpose
BIGipServerLP_7080_MICROSV	Session	Strictly Necessary
BIGipServerLP_HTTPS_JAZ_TADAWUL	Session	Strictly Necessary
dtCookie7a1jg9as	Session	Analytics
dtPC7a1jg9as	Session	Analytics
dtSa7a1jg9as	Session	Analytics
rxVisitor7a1jg9as	Session	Analytics
rxvt7a1jg9as	Session	Analytics
ga	2 years	Analytics
_ga_9W9Z2JG5C4	2 years	Analytics
dtCookie7a1jg9as	Session	Strictly Necessary
dtPC7a1jg9as	Session	Analytics
dtSa7a1jg9as	Session	Analytics
rxVisitor7a1jg9as	1 year	Analytics
rxvt7a1jg9as	Session	Analytics

17 Your Rights

Subject to the applicable laws and regulations, including the PDPL, you may have certain rights relating to your Personal Data. These rights may include:

- **Right to be informed:** the right to be informed about the legal basis and purposes for collecting and Processing your Personal Data.
- **Right of access:** the right to access your Personal Data held by us and request a copy of such Personal Data in a commonly used format, subject to applicable legal and regulatory requirements.
- **Right to correction:** the right to request correction, completion, or updating of inaccurate or incomplete Personal Data.
- **Right to destruction:** the right to request the destruction or deletion of Personal Data where such Personal Data is no longer required, subject to applicable legal, regulatory, and retention obligations.
- **Right to withdraw consent:** where Processing is based on consent, you may withdraw your consent at any time. Withdrawal of consent will not affect the lawfulness of Processing carried out prior to the withdrawal or any Processing based on another legal basis.
- **Right to complain:** the right to submit a complaint to the competent authority in accordance with the applicable laws and regulations.
- **Right to compensation:** the right to seek compensation for material or moral damage resulting from violations of applicable data protection laws and regulations, subject to the applicable legal requirements.

If you wish to exercise any of your rights or have any concerns regarding the Processing of your Personal Data, you may contact us using the contact details provided in this Privacy Notice. Please note that certain rights may be restricted, limited, or subject to legal, regulatory, contractual, or operational requirements applicable to AJB as a Capital Market institution regulated by the CMA.

18 Review and Updates

We may update or amend this Privacy Notice from time to time to reflect changes in our business activities, products, services, legal or regulatory obligations, operational practices, technologies, or applicable laws and regulations.

The most current version of this Privacy Notice will be made available through our website, applications, digital platforms, or other appropriate communication channels, together with the effective date of the latest update.

We encourage you to review this Privacy Notice periodically to remain informed about how we collect, use, process, and protect Personal Data.

It is important that the Personal Data we hold about you remains accurate and up to date. Please inform us if your Personal Data changes during your relationship with us.

19 Contact Us

If you have any questions, requests, concerns, or complaints regarding this Privacy Notice or the Processing of your Personal Data, you may contact AJB through the contact details provided below.

AJB's Data Protection function is responsible for overseeing matters relating to privacy, data protection, and compliance with applicable data protection laws and regulations.

Contact Details:

Email: DataPrivacyOffice@aljaziracapital.com.sa.