



PRIVACY POLICY: DATA PRIVACY STATEMENT

This privacy policy of SH Capital (DIFC) Ltd. (“SHCL”, “the Company”, “we”, “us”) explains how we collect, use and disclose your personal data. This applies to every individual who access, use, and/or interact, use our services including independent contractors, consultants, vendors or service providers from whom we receive services.

SHCL collects certain information about you including:

- Personal Identification Information (Name, contact data, financial data, IDs etc.)
- Information that we require for compliance with anti-money laundering, financial and other regulations (ex. Know Your Customer documents)
- Background information, investment plans and requirements

How do we collect your data?

You directly provide us with most of the data we collect. We collect data and process data when you:

- Engage in any of our services.
- Meetings/Interactions
- Partners, service providers or financial intermediaries who work with us
- Entities that provide content or information to be used in our services
- Identifiers by use or view of our website (browser’s cookies etc.).
- Voluntarily contact us or provide feedback to us.
- Public domain sources (e.g., websites, internet, search engines, etc.).

Our Company may also receive your data indirectly from the following sources:

- Referral from business partner(s) or existing Clients
- Other sources

The sources from which the personal information may be received or collected are responsible for their own compliance with applicable data protection/privacy laws.

How will we use your data?

We collect your data so that we can:

- Facilitating advisory services and managing your portfolio accounts or investments.
- Responding to your communications such as queries, complaints
- Market you with information on other products and services we think you might like (Subject to relevant rules and regulations)
- Carrying out necessary compliance processes such as anti-money laundering checks
- Providing information about our products and services
- Complying with applicable laws, court orders, and regulatory requests, cooperating with authorities and complying with our financial reporting obligations.
- Analyzing our business and customer data for business development purposes;

Where applicable, our Company will share your data with our business partners/service providers so that they may execute/store information. We may send your data to, and also use the resulting information from, credit reference, screening tools etc.

Marketing

Our Company may send you information about similar or related products and services of ours that we think you might like, as well as those of our business partners.

You have the right, at any time, to stop our Company from contacting you for marketing purposes or sharing your data with others. If you no longer wish to be contacted for marketing purposes, you can use the "Contact Us" option on our website, or you can use the specific unsubscribe options made available in the marketing communication.

What are your data protection rights?

Our Company would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- The right to access – You have the right to request us for copies of your personal data. We may charge you a small fee for this service.
- The right to rectification – You have the right to request us to correct any information you believe is inaccurate. You also have the right to request to complete any information you believe is incomplete.
- The right to erasure/to be forgotten – You have the right to request that we erase your personal data, under certain conditions.
- The right to restrict processing – You have the right to request that we restrict the processing of your personal data, under certain conditions.
- The right to object to processing – You have the right to object to processing of your personal data, under certain conditions.
- The right to data portability – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you would like to exercise any of these rights, or please make a request by contacting us.

Should you not be satisfied with the way we have responded to your concerns you have the right to submit a complaint to us. If you are still unhappy with our reaction to your complaint, you can escalate it as stated below.

Privacy policies of other websites

Our company's website may contain links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

Changes to our policy

We keep our privacy policy under regular review and place any updates on our web page.

How to contact us

If you have any questions about our privacy policy, complaints or you would like to exercise any of your data protection rights, please do not hesitate to contact us:-

Call: +971 4 5562700

Email: capcompliance@sh-financial.com

Website: "Contact Us" Option

How to contact the appropriate authority

Should you wish to report a complaint or if you feel that we have not addressed your concern in a satisfactory manner, you may contact the Data Protection Commissioner's Office:-

Email : commissioner@dp.difc.ae

Contact : +971 4 362 2222

Address:

The Office of the Commissioner Data Protection,

Dubai International Financial Centre Authority

Level 14, The Gate Building,

Dubai, United Arab Emirates

DIFC's Data Protection Officer may be contacted using the above contact or via email at dpo@difc.ae