



**CREDIT
FINANCIER
INVEST**

EMPOWER YOURSELF

PRIVACY POLICY

CFI FINANCIAL MARKETS L.L.C

CFI Financial Markets L.L.C (the "CFI Financial") is domiciled in the mainland under the Dubai Economic Department jurisdiction, and is regulated by the Securities and Commodities Authority ('SCA') regulatory license number 20200000154 in the UAE. SCA has granted the Category 1 license to carry out (a) Trading broker in the international markets; and (b) Trading broker of OTC derivatives and currencies in the Forex Spot Market, Foreign exchange spot markets, the registered office No. 2102 Blvd Plaza T1, Burj Khalifa area, United Arab Emirates.

OTC derivatives are complex instruments and come with a high risk of losing money rapidly due to leverage. Your profit and loss will vary according to the extent of the fluctuations in the price of the underlying markets on which the trade is based. For many members of the public, these Transactions are not appropriate. You should, therefore, consider carefully whether they are appropriate for you considering your knowledge/experience, financial resources and investment objectives. Please read carefully risk disclosure statement before trading with the Firm.

While we will notify you of any material changes to this Privacy Policy, we encourage you to review this Privacy Policy periodically. We will also keep prior versions of this Privacy Policy in an archive for your review.

IN RESPECT OF THE PRIVACY POLICY BELOW INFORMATION PROVIDES A DETAIL DESCRIPTION OF:

1. GENERAL

The Personal Data Protection Law, Federal Decree Law No. 45 of 2021 regarding the Protection of Personal Data, constitutes an integrated framework to ensure the confidentiality of information and protect the privacy of individuals in the UAE. Accordingly, CFI Financial shall carry out its activities in accordance with these regulations and further applicable SCA regulations in this regard.

The Firm is committed to protecting your privacy and the confidentiality of your personal information. In order to comply with privacy legislation, we have developed this Privacy Policy. Any personally identifiable information about a customer* is considered personal information ("Personal Information") and will be treated in accordance with this Privacy Policy. Please read the following carefully to understand our views and practices regarding your personal data.

By visiting www.cfifinancial.com you are accepting and consenting to the practices described in this Policy.

All employees of the Firm are trained to handle personal information in respect of the confidentiality of customer information and privacy of individuals. We regard breaches of your privacy very seriously, and will impose appropriate penalties, including dismissal, for any such breach, should we deem it necessary.

For the purposes of this Law, we have nominated a data protection officer to ensure that the management of personal information complies with this Law and this policy.

2. WE WILL COLLECT AND PROCESS THE FOLLOWING DATA ABOUT YOU FROM

2.1 WHEN YOU VISIT OUR WEBSITES

You are free to explore the Websites without providing any Personal Information about yourself. When you visit the Websites or register for more information, we request that you provide Personal Information about yourself, and we collect only Navigational Information.



**CREDIT
FINANCIER
INVEST**

EMPOWER YOURSELF

2.1 (a) Personal Information

This refers to any information that you voluntarily submit to us and that identifies you personally, including contact information, such as your name, e-mail address, company name, address, phone number, and other information about yourself or your business. Personal Information can also include information that you enter into Websites and information about you that is available on the internet, such as from Facebook, LinkedIn, Twitter and Google, or publicly available information that we acquire from service providers.

Personal Information also includes Navigational Information. Navigational information refers to information about your computer and your visits to this website such as your IP address, geographical location, browser type, referral source, length of visit and pages viewed.

When view content provided by us, we automatically collect information about your computer hardware and software. This information can include your IP address, browser type, domain names, internet service provider (ISP), the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, clickstream data, access times and referring website addresses. This information is used by CFI Financial for its operations, to maintain the quality of our Service, and to provide general statistics regarding use of the CFI Financial Website. For these purposes, we do link this automatically collected data to Personal Information such as name, email address, address, and phone number.

We also have a telephone recording system, where the telephonic conversations between you and our staff is recorded in the order of date, time and duration.

2.1(b) Information we collect from third parties

From time to time, we may receive Personal Information about you from third party sources including partners with which we offer co-branded services or engage in joint marketing activities, and publicly available sources such as social media websites. We use this information to assist us in the AML/CFT matters.

3. USAGE OF THE INFORMATION COLLECTED BY US

3.1 COMPLIANCE WITH OUR PRIVACY POLICY

We use the information, we collect only in compliance with this Privacy Policy. Users who subscribe to our Services are obligated through our agreements with them to comply with this Privacy Policy.

- We Never Sell Personal Information
- We will never sell your Personal Information to any third party.

3.2 USE OF PERSONAL INFORMATION:

In addition to the uses identified elsewhere in this Privacy Policy, we may use your Personal Information to:

- improve your browsing experience by personalizing the Websites and improving the Subscription Service.
- send information or CFI Financial content to you which we think may be of interest to you by post, email, or other means and send you marketing communications relating to our business;
- promote use of our services to you and share promotional and information content with you in accordance with

your communication preferences;

- provide other companies with statistical information about our users -- but this information will not be used to identify any individual user;
- send information to you regarding changes to our Customer Terms of Service, Privacy Policy or other legal agreements; and
- meet legal requirements.

We may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, we do not transfer your Personal Information to the third party.

We use the information collected through our website by our users for the following purposes.

- to respond to customer support requests; and
- otherwise to fulfil the obligations under the CFI Financial "Terms of Service".

3.3 LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION (EEA VISITORS ONLY)

If you are a visitor/customer located in the European Economic Area ("EEA"), CFI Financial shall be your data controller of your personal information. Therefore, you need to talk to your Data Protection Officer at (Email id of the data protection officer).

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are:

3.2. (a) Use of Navigational Information

We use Navigational Information to operate and improve the Websites and the Subscription Service. We may also use Navigational Information alone or in combination with Personal Information to provide you with personalized information about CFI Financial.

3.2. (b) Customer Testimonials and Comments

We post customer testimonials and comments on our websites, which may contain Personal Information. We obtain each customer's consent via email prior to posting the customer's name and testimonial.

3.2. (c) Security of your Personal Information

We use a variety of security technologies and procedures to help protect your Personal Information from



**CREDIT
FINANCIER
INVEST**

EMPOWER YOURSELF

unauthorized access, use or disclosure. We secure the Personal Information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. All Personal Information is protected using appropriate physical, technical and organizational measures.

3.2. (d) Social Media Features

Our websites include Social Media Features, such as the Facebook Like button and Widgets, such as the Share This button or interactive mini-programs that run on our sites. These features may collect your IP address, which page you are visiting on our sites, and may set a cookie to enable the feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our websites. This Privacy Policy does not apply to these features. Your interactions with these features are governed by the privacy policy and other policies of the companies providing them.

3.2. (e) External Websites

Our websites provide links to other websites. We do not control, and are not responsible for, the content or practices of these other websites. Our provision of such links does not constitute our endorsement of these other websites, their content, their owners, or their practices. This Privacy Policy does not apply to these other websites, which are subject to any privacy and other policies they may have.

3.2. (f) Public Forums

We offer publicly accessible message boards, blogs, and community forums. Please keep in mind that if you directly disclose any information through our public message boards, blogs, or forums, this information may be collected and used by others. We will correct or delete any information you have posted on the Websites if you so request, as described in "Opting Out and Unsubscribing" below.

4. RETENTION OF PERSONAL INFORMATION

How long we keep the information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete or anonymize your information or, if this is not possible, then we will securely store your information and isolate it from any further use until deletion is possible.

We retain Personal Information that you provide to us where we have an ongoing legitimate business need to do so (for example, as long as is required in order to contact you about the Subscription Service or our other services, or as needed to comply with our legal obligations, resolve disputes and enforce our agreements).

When we have no ongoing legitimate business need to process your Personal Information, we securely delete the information or anonymize it or, if this is not possible, then we will securely store your Personal Information and isolate it from any further processing until deletion is possible. We will delete this information from the servers at an earlier date if you so request, as described in "To Unsubscribe from Our Communication's below.

If you provide information to our customers as part of their use of the Subscription Service, our customers decide how long to retain the personal information they collect from you. If a customer terminates its use of the Subscription Service, then we will provide customer with access to all information stored for the customer by the Subscription Service, including any Personal Information provided by you, for export by the customer according to our agreement with our customer. After termination, we may, unless legally prohibited, delete all customer information, including your Personal Information, from the Subscription Service.

If you have elected to receive marketing communications from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our content, products, or services, such as

when you last opened an email from us or ceased using your CFI Financial. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

5. HOW WE SHARE INFORMATION WE COLLECT

5.1 SERVICE PROVIDERS

We employ other companies and people to provide services to visitors to our websites, our customers, and users of the Subscription Service and may need to share your information with them to provide information, products or services to you. Examples may include removing repetitive information from prospect lists, analyzing data or performing statistical analysis, providing marketing assistance, supplementing the information you provide us in order to provide you with better service, and providing customer service or support. In all cases where we share your information with such agents, we explicitly require the agent to acknowledge and adhere to our privacy and customer data handling policies. Also the client complaints handling.

5.2 PARTNERS OF CFI FINANCIAL

In addition, we may share data with trusted partners to contact you based on your request to receive such communications, help us perform statistical analysis, or provide customer support. Third parties are prohibited from using your Personal Information except for these purposes, and they are required to maintain the confidentiality of your information.

We partner with trusted third parties to provide you with co-marketing content that we think may be relevant to you. When you engage with these co-marketing partners, we will tell you who we are sharing data with and provide a link to the co-marketing partner's privacy policy so you can learn more about how to opt-out of the partner's communications. These co-marketing partners are required to adhere to our privacy and data protection policies. For more information on our co-marketing program, see this page.

5.3 CORPORATE EVENTS

If we (or our assets) are acquired by another company, whether by merger, acquisition, bankruptcy or otherwise, that company will receive all information gathered by CFI Financial on the Websites. In this event, you will be notified via email and/or a prominent notice on our website, of any change in ownership, uses of your Personal Information, and choices you may have regarding your Personal Information.

5.4 COMPELLED DISCLOSURE

We reserve the right to use or disclose your Personal Information if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or comply with a law, court order, or legal process.

6. INTERNATIONAL TRANSFER OF INFORMATION

6.1 INTERNATIONAL TRANSFERS WITHIN CFI FINANCIAL 'S ENTITIES

To facilitate our global operations, we transfer information to our offices and allow access to that information from there in which CFI Financial affiliated entities have operations for the purposes described in this policy.



**CREDIT
FINANCIER
INVEST**

EMPOWER YOURSELF

This Privacy Policy shall apply even if we transfer Personal Information to other countries. We have taken appropriate safeguards to require that your Personal Information will remain protected. When we share information about you within and among CFI Financial's affiliated entities, we make use of standard contractual data protection clauses, which have been approved by the European Commission, and we rely on the EU-U.S. and Swiss-U.S. Privacy Shield Framework to safeguard the transfer of information we collect from the European Economic Area and Switzerland. Please see our Privacy Shield notice below for more information.

6.2 INTERNATIONAL TRANSFERS TO THIRD PARTIES

Some of the third parties described in this privacy policy, which provide services to us under contract, are based in other countries that may not have equivalent privacy and data protection laws to the country in which you reside. When we share information of customers in the European Economic Area or Switzerland, we make use of the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks, European Commission-approved standard contractual data protection clauses, binding corporate rules for transfers to data processors, or other appropriate legal mechanisms to safeguard the transfer. Please see our Privacy Shield Notice below.

Privacy Shield Notice

CFI Financial participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework. The following affiliated entities adhere to the Privacy Shield principles: CFI Financial. Unique Properties is committed to subjecting all personal data received from European Union (EU) member countries and Switzerland, in reliance on the Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Framework, visit the Privacy Shield List at <https://www.privacyshield.gov>.

CFI Financial is responsible for the processing of personal data it receives under the Privacy Shield Framework and subsequently transfers to a third party acting as an agent on its behalf. Unique Properties complies with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily you may direct any inquiries or complaints related to our Privacy Shield compliance to privacy@uniqueproperties.ae.

Under certain conditions, more fully described on the Privacy Shield website, you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

7. COOKIES AND SIMILAR TECHNOLOGIES

7.1 COOKIES

CFI Financial and its partners use cookies or similar technologies (such as web beacons) to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. To find out more about how we use cookies on our websites and how to manage your cookie preferences please see our Cookie Policy.

Navigational Information Collected by Our Customers

Our customers can use the tools we provide, as well as tools provided by third parties, to collect Navigational Information when you visit their webpages on the Subscription Service. CFI Financial does not control our customers' use of these

tools, nor do we control the information they collect or how they use it.

7.2 FLASH COOKIES AND OTHER THIRD-PARTY TRACKING TECHNOLOGIES

The Adobe Flash Player (and similar applications) use technology to remember settings, preferences and usage similar to browser cookies but these are managed through a different interface than the one provided by your Web browser. This technology creates locally stored objects that are often referred to as “Flash cookies.” Unique Properties does not use Flash cookies. However, our customers of our software platform may create pages on the CFI Financial platform that employ Adobe Flash cookies. For more information on “Flash cookies” and how you can manage them please visit our Cookie Policy.

7.3 ADVERTISING

We partner with a third-party ad network to either display advertising on our Web site or to manage our advertising on other sites. Our ad network partner uses cookies and Web beacons to collect information about your activities on this and other Web sites to provide you targeted advertising based upon your interests. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt-out by clicking here: xxxx (provide the preference). Please note this does not opt you out of being served advertising. You will continue to receive generic ads.

7.4 THIRD PARTY TRACKING TECHNOLOGIES

The use of cookies and web beacons by any tracking utility company is not covered by our Privacy Policy or Cookie Policy.

8. HOW TO ACCESS & CONTROL YOUR PERSONAL DATA

8.1 REVIEWING, CORRECTING AND REMOVING YOUR PERSONAL INFORMATION

You have the following data protection rights:

- You can request access, correction, updates or deletion of your personal information.
- You can object to processing your personal information, ask us to restrict processing of your personal information or request portability of your personal information.
- If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. Contact details for data protection authorities in the EEA, Switzerland and certain non-European countries (including the US and Canada) are available here.)

To exercise any of these rights, please contact us at (email id of data processing officer) or by mail to CFI Financial, uae@cfifinancial.com , Dubai, United Arab Emirates, Attention: Privacy.



EMPOWER YOURSELF

We will respond to your request to change, correct, or delete your information within a reasonable timeframe and notify you of the action we have taken.

8.2 ANTI-SPAM POLICY

Our Acceptable Use Policy applies to us and to our customers and, among other things, prohibits use of the Subscription Service to send unsolicited commercial email in violation of applicable laws, and requires the inclusion in every email sent using the Subscription Service of an “opt-out” mechanism and other required information. We require all of our customers to agree to adhere to the Acceptable Use Policy at all times, and any violations of the Acceptable Use Policy by a customer can result in immediate suspension or termination of the Subscription Service.

8.2 (A) TO UNSUBSCRIBE FROM OUR COMMUNICATIONS

You may unsubscribe from our marketing communications by clicking on the “unsubscribe” link located on the bottom of our e-mails, updating your communication preferences, or by sending us email us at email id of data processing officer) or postal mail to CFI Financial, Dubai, United Arab Emirates, Attention: Privacy. Customers cannot opt out of receiving transactional emails related to their account with us.

November, 2023