

Privacy Policy

CFI Financial (Bahrain) B.S.C CLOSED, located at Office 26C, Floor 26, East Tower, Bahrain Financial Harbour, Manama, Bahrain is an Investment Business (Category 2) licensed and regulated by the Central Bank of Bahrain to provide investment services.

At CFI Financial (Bahrain) B.S.C CLOSED, safeguarding your personal and financial information is our highest priority. We respect your privacy rights and are committed to ensuring the security of your information online. Please take the time to carefully review this privacy policy before using our website.

This policy is prepared in accordance with the Bahrain Personal Data Protection Law (PDPL) (Law No. 30 of 2018), as may be amended from time to time.

In this privacy policy, the terms “we,” “us,” and “our” refer to CFI Financial (Bahrain) B.S.C CLOSED, while “you,” “your,” and “the user” refer to the individual or an authorized representative of a corporate entity using this website. As part of our provision of financial products and services, we collect and maintain certain personal information.

This privacy statement outlines how we collect, use, and protect your personal information. We ensure that your personal information is not used or disclosed without your consent unless otherwise required. By opening an account or using our website, you consent to the collection, use, and disclosure of your personal information in accordance with this policy.

1- Definitions

- **Affiliate:** Any company, organization, or legal entity that is directly or indirectly controlled by, controls, or is under common control with CFI Financial (Bahrain) B.S.C CLOSED, including subsidiaries, parent companies, and other associated entities.
- **Personal Information:** Any information that identifies or can be used to identify, contact, or locate an individual, or that can be combined with other information to identify a specific individual. This includes, but is not limited to, name, address, email, phone number, date of birth, financial details, trading activity, and other sensitive data.
- **Products:** The financial products or services offered by CFI Financial (Bahrain) B.S.C CLOSED through the website, including trading accounts, investment tools, and other services related to financial transactions.

2- Collection and Use of Personal Information

We collect personal information from you through our website. You may provide this information when subscribing to our products or services, filling out account opening applications (whether written or electronic), or submitting information through other forms.

Personal information may include your name, mailing address, telephone number, email address, and other identification details. We may also collect demographic information such as birthdate, education, occupation, and details about your intended transactions with us. Additionally, we assess your trading experience, estimated annual income, and net worth to evaluate your financial position and suitability for engaging in transactions with us. We also gather data about transactions you make through our website. We also collect the identification documents and source of funds information required for customer due diligence, the results of sanctions and politically exposed person screening, recordings of telephone calls, and technical data such as your IP address and cookie identifiers.

We use this information to verify your identity, set up and manage your trading account, issue account details such as numbers and secure passwords, monitor account activity, and communicate important account-related information. Your information helps us personalize our services, enhance your browsing experience, and inform you about additional products, services, or promotions that may be of interest to you.

The information we collect, why we process it, and the basis on which we rely, are set out below:

Information we collect	Why we process it	Basis under the PDPL
Identity and contact details, including verification documents	Onboarding, identity verification and account administration	Performance of a contract; legal obligation
Due diligence data, including source of funds and screening results	Anti-money laundering, counter-terrorist financing and sanctions compliance	Legal obligation
Financial position and trading experience	Assessing whether our products are appropriate and suitable for you	Legal obligation; performance of a contract
Account and transaction data	Order execution, settlement, record keeping and transaction monitoring	Performance of a contract; legal obligation
Communications, including call recordings	Record keeping, complaint handling and dispute resolution	Legal obligation; legitimate interests
Website and device data, including cookies	Website security, fraud prevention and analytics	Legitimate interests; consent

Where information is mandatory, we will tell you so when we collect it. If you do not provide it, we may be unable to open or continue to operate your account.

We retain your information even after account closure or if your application is declined or abandoned, for as long as needed to comply with legal and regulatory requirements, as well as for legitimate business purposes. We retain your information for ten (10) years following the end of the client relationship, or longer where required by Bahraini law or by the Central Bank of Bahrain.

3- Disclosure of Personal Information

By accepting this Privacy Policy and using the services of the Company, the Client acknowledges and agrees that the Company may disclose personal data and confidential information, including but not limited to identification documents, recordings, communications, and account details, in the following circumstances:

- Where such disclosure is required by applicable law, regulation, legal process, or by order of a competent court or authority;
- Where requested by any regulatory, supervisory, tax, governmental, or other authority having control or jurisdiction over the Company or the Client, or in any jurisdiction in which the Company operates;
- To professional advisors of the Company, including legal, tax, or audit service providers, who are bound by strict confidentiality obligations;
- To other entities within the CFI Financial group, for account administration, order execution, technology and back-office support, and group risk and compliance functions;
- To third-party service providers engaged by the Company in relation to the provision of its services, including but not limited to IT support, hosting, data storage and backup, record keeping, payment processing, customer communication, and similar operational services, provided that such third parties are contractually bound by confidentiality and data protection obligations;
- To any person or entity to whom the Company is permitted or required to make such disclosure under applicable laws and regulations.
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Where personal data is transferred outside the Kingdom of Bahrain, the Company ensures that such transfer complies with Article 12 of the PDPL. The Client understands and accepts that such disclosures are necessary for the proper functioning of the business relationship with the Company and for compliance with legal, regulatory, and operational obligations. The Company shall take all reasonable steps to ensure that any third-party recipients of Client data maintain adequate levels of data protection. Such disclosure of confidential information shall be limited to the purposes described above and personal data shall be retained for a period of ten (10) years following the end of the client relationship, unless a longer period is required by law (e.g., for anti-money laundering compliance). Any extension of this retention will be assessed and documented in accordance with PDPL requirements.

The Company shall not be held liable for any loss or damage arising as a result of lawful disclosures carried out in accordance with this Privacy Policy. The Company shall remain accountable for ensuring that all disclosures are carried out in accordance with the Bahrain PDPL and that appropriate safeguards are in place to protect the Client's personal data. Under Bahrain's Personal Data Protection Law, data subjects have the right to access, correct, delete, or object to the processing of their personal data, and to lodge a complaint with the Bahrain Personal Data Protection Authority (PDPA) if they believe their data is being mishandle.

You have the right to withdraw your consent to the processing of your personal data and to request its erasure at any time by contacting us at compliance.bh@cfi.trade. However, please note that we may be required to retain

certain personal data for a specified period in accordance with legal and regulatory obligations, including for the purposes of anti-money laundering and counterterrorism financing compliance.

4- Security of Personal Information

We have implemented appropriate measures to ensure the security of your personal information. Our website uses secure communication channels (HTTPS) to protect data transmission. Information is encrypted using Secure Sockets Layer (SSL) software, which uses 128-bit encryption, the most secure commercially available encryption standard, to ensure the safety of your transactions.

We provide you with a unique username and password for secure online access to your account. You are responsible for keeping this password confidential.

Please note that while we take all necessary precautions, no method of transmitting data over the internet is 100% secure. We have systems in place to protect your personal information, but cannot guarantee the security of any data transmitted to us.

Where a personal data breach occurs, we will notify the Personal Data Protection Authority within 72 hours of becoming aware of it, unless the breach is unlikely to result in a risk to your rights, and will inform you directly where required.

5- Customer Rights

In accordance with the Personal Data Protection Law No. (30) of 2018, you have the following rights regarding the processing of your personal data:

1. Right to Enquire: You have the right to request information about the personal data we hold, including the purposes for which it is collected, stored, and processed.
2. Right to Object: You have the right to object to being contacted for direct marketing purposes. If you wish to opt-out of marketing communications, please contact us at: compliance.bh@cfi.trade.
3. Right to Rectification, Blocking, or Erasure: You may request to rectify, block, or erase your personal data if it has been processed in violation of the law, such as if the data is inaccurate, incomplete, outdated, or processed unlawfully.
4. Right to Withdraw Consent: You have the right to withdraw consent at any time. This withdrawal applies to future use of your personal data and does not affect the lawfulness of any processing before the withdrawal. Withdrawing consent for certain mandatory data may impact our ability to continue providing certain services.
5. Right to Object to Processing Causing Material or Moral Damage: You have the right to submit an application documenting your objection to process personal data for a purpose or manner that is causing unwarranted substantial damage, being material or moral.

6. Right to be notified: You have the right to be notified of the personal data processed by us, the course of such data, purpose of processing, and the names of the recipients of your data.
7. Right to Complain: You have the right to file a complaint with the relevant authority if you believe a violation of privacy laws has occurred or if your personal data is being processed unlawfully.
8. Right to Object to Decisions Based on Automated Processing: Where a decision assessing your financial standing, creditworthiness, reliability or conduct is taken solely by automated means, you may ask us to reconsider it other than solely automatically. Reconsideration is free of charge. See Section 7.

6- How to Exercise Your Rights

To exercise any of the rights in Section 5, contact us at compliance.bh@cfi.trade. Please tell us which right you wish to exercise and enclose valid proof of identity. We do not charge for handling requests.

We will respond within fifteen (15) working days to a request to be told whether we are processing your personal data. Where we are, our response will set out the data being processed, its source (unless the source is confidential by law), the purpose of the processing, the recipients or categories of recipients, and, where a decision directly affecting you is based solely on that data, how the data is used.

We will respond within ten (10) working days to a request to rectify, block or erase your data, to object to direct marketing, or to object to processing causing you material or moral damage.

Where a request is incomplete, we will ask you for the missing information within ten (10) days. Where we accept or reject a request, in whole or in part, we will give you a reasoned decision within the applicable period above.

Where the data is subject to a legal or regulatory retention requirement, including for anti-money laundering purposes, we may be unable to give full effect to a request for erasure or a withdrawal of consent, and will explain why. If your request is rejected, or you receive no response within the applicable period, you may complain to the Personal Data Protection Authority.

7- Automated Decision-Making

We use automated processing to screen applicants against sanctions and politically exposed person lists, to monitor transactions for anti-money laundering purposes, and to assess whether our products are appropriate for you.

Where a decision assessing your financial standing, creditworthiness, reliability or conduct is taken solely by automated means, you may ask us to reconsider it other than solely automatically, free of charge, by contacting us as set out in Section 6. This does not apply where the decision is taken in the course of entering into or performing a contract with you and we have taken suitable measures to safeguard your interests, including giving you the opportunity to make representations.

8- Account Closure

Upon request, CFI Financial (Bahrain) B.S.C CLOSED will close your account in accordance with applicable laws, regulations, and the User Agreement. To close your account, there must be no outstanding balance. We will retain your account information, due diligence records, personal data, and any other relevant records for a minimum of 10 years following account closure, as required by Central Bank of Bahrain regulations.

9- Third Parties

This privacy policy applies solely to the information collected by CFI Financial (Bahrain) B.S.C CLOSED. If you share your personal information with third parties, including partners or service providers, those third parties may have their own privacy policies. CFI Financial (Bahrain) B.S.C CLOSED does not control the privacy practices of third parties, so we encourage you to review their privacy policies.

10- Direct Marketing

With your consent and in compliance with applicable laws, CFI Financial (Bahrain) B.S.C CLOSED may occasionally send you marketing materials about our products, services, or activities. You will always have the option to opt-out of these communications. You may also choose to restrict the sharing of your personal information with third parties

for marketing purposes. Please note that restricting such sharing may limit the availability of certain services or features.

11- Disputes and Legal Proceedings

We may need to use personal information to investigate and resolve disputes efficiently. If a mutual resolution is possible, CFI Financial (Bahrain) B.S.C CLOSED will collaborate with regulators and relevant authorities to resolve any issues in compliance with Bahraini law. Disputes regarding this privacy policy will be handled according to the terms specified in the User Agreement.

12- Use of Cookies



We use cookies to enhance your experience on our website and secure your trading activities. Cookies are small text files sent from the web server to your computer and do not contain personal information, account details, or passwords. We are not responsible for third-party cookies.

13- Accessing and Updating Your Personal Information

You have access to your personal information through our website, where you can view and, in some cases, update your account details. It is your responsibility to ensure that your information is kept up to date.

14- Call Recording

For service quality, compliance purposes, and to protect both parties, we may record and monitor telephone calls with you.

15- Links to Other Websites

Our website may contain links to third-party websites. We are not responsible for their privacy practices. This privacy policy applies only to information collected through our website.

16- Modifications to This Privacy Policy

We reserve the right to amend this privacy policy at any time. Changes will be effective upon posting, so we encourage you to check our website regularly for updates.

17-Contact Us

If you have any questions about this privacy policy, wish to opt-out of communications, or need to update your information, please contact us at: info.bh@cfi.trade.

For any matter concerning your personal data, including to exercise any of the rights in Section 5, contact us at compliance.bh@cfi.trade. If you are not satisfied with our response, you may complain to the Personal Data Protection Authority of the Kingdom of Bahrain.

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