

## Riyad Capital - Privacy Policy

### *Our Commitment to You*

RC appreciates the opportunity to help you meet your investment needs. We are committed to safeguarding the privacy and confidentiality of the 'Personal Information' (defined in Annex A) you have entrusted to us. It is important for you to understand what Personal Information we will collect, how we will use it, and who may access it.

### *Who we are*

Riyad Capital is a Saudi Closed Joint Stock Company with licensed by the Saudi Arabian Capital Market Authority (NO.07070-37). Commercial Registration No. 1010239234. Head Office: 6775 Takhassusi Street – Olaya, Riyadh 12331-3712 , Saudi Arabia .

### *Scope*

This Privacy Policy applies to the operations of Riyad Capital to the extent described below.

In certain limited circumstances (such as in relation to KYC information from), Riyad Capital will collect Personal Information directly from individuals in the EEA or send marketing to individuals in the EEA. When it does so, the Personal Information will be used for the same purposes and on the same bases as set out in this Privacy Policy. In these circumstances (i.e. if you were in the EU) in respect of that Personal Information should you wish to exercise any of your rights or otherwise get in touch with RC concerning the use of that Personal Information, please direct these to RC by following the instructions in the Contact Us section below.

Further notices highlighting certain uses we wish to make of your Personal Information together with the ability to opt in or out of selected uses may be provided when we collect Personal Information from you.

Our websites may contain links to other third party websites. If you follow a link to any of those third party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your Personal Information. Please check these policies before you submit any Personal Information to such third party websites.

This Privacy Policy outlines our commitment to you.

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- [1. Accountability](#)

We have strict policies and procedures governing how we deal with your Personal Information (see Annex A: Definitions). Each and every one of our employees is responsible for respecting and protecting the Personal Information to which the employee has access.

Our Data Protection Officer oversees privacy governance including policy, dispute resolution, education, communications activities. Please see the 'Contact Us' section for information on how to reach our Data Protection Officer (DPO)

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- [2. Personal Information that we collect](#)

We only collect the Personal Information *that* we determine we need for the purposes set out in 3. Purposes. For example, we may collect:

- **Information you provide to us** ► Personal Information that you provide to us, such as when using the contact form on our websites or providing us with a business card, including your name, email address, and other contact details;
- **Credit and Anti-Crime and Fraud Information** ► information relating to your financial/investment situation, your creditworthiness or any criminal or fraudulent activities provided to us by you or third parties including information which establishes your identity, such as ID, driving licences, and passports; information about transactions, credit ratings from credit reference agencies or information pooling groups; fraud, offences, suspicious transactions, politically exposed person and sanctions lists where your details are included;
- **Financial /Investment Information** ► to ensure that the advice and/or products we provide you are appropriate for you and the investments you purchase are suitable for you;
- **Your transactions and holdings** ► details of transactions with us or holdings with us that you have made or initiated;
- **Our correspondence** ► if you contact us, we will typically keep a record of that correspondence;
- **Device Information** ► such as information about your operating system, browser, software applications, IP address, geolocation, security status and other device information in order to improve your experience, to protect against fraud and manage risk;
- **Website and communication usage** ► details of your visits to the websites and information collected through cookies and other tracking technologies including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access;

- **Marketing preference information** ► details of your marketing preferences (e.g. communication preferences) and information relevant to selecting appropriate products and services to offer you;
- **Email tracking information** ► our emails may contain a single, campaign-unique “web beacon pixel” to tell us whether our emails are opened and combined with other technology verify any clicks through to links within the email. We may use this information for purposes including determining which of our emails are more interesting to you and to query whether users who do not open our emails wish to continue receiving them. The pixel will be deleted when you delete the email. If you do not wish the pixel to be downloaded to your device, you should select to receive emails from us in plain text rather than HTML or choose not to click links that we send you or unsubscribe from the receipt of our emails. This information may be include Personal Information;
- **Call recordings and CCTV** ► we may monitor or record our incoming or outgoing telephone calls with you to ensure accuracy, security, service quality, for training purposes and to establish a record of our communications. We may record CCTV footage in and around our premises and other locations for the safety of our clients and employees, and to protect against theft, property damage and fraud;
- **Survey information** ► we may also ask you to complete surveys that we use for research purposes. In such circumstances, we shall collect the information provided in the completed survey.
- **Activities on Social Networking Sites (SNS)** ► if you choose to participate (for example, by posting a public comment or opinion about Riyadh Capital on Facebook, Twitter or LinkedIn), we will have access to the information you divulge which may include Personal Information, depending on your SNS privacy settings.

- [3. Purposes for which we use your Personal Information](#)

When we collect your Personal Information, we may use or disclose it for the following purposes. Below each purpose, we note the “legal ground” that allows that use of your Personal Information. An explanation of the scope of the “legal grounds” can be found in Annex B (see Annex B: Table of legal Bases).

- **To provide and manage products and services you have requested** ► to administer our services, including to carry out our obligations arising from any agreements entered into between you and us, or to notify you about changes to our services and products.

***Use justifications:** contract performance; legitimate interests (to enable us to perform our obligations and provide our services to you or to notify you about changes to our service)*

- **To verify your identity, protect against fraud and manage risk** ► we and other organisations may access and use certain information to prevent fraud, money laundering and terrorism as may be required by applicable law and regulation and best practice at any given time, including checking against sanctions, politically exposed persons (PEP) and other fraud or crime screening databases. If false or inaccurate information is provided and fraud is identified or suspected, details may be passed to fraud prevention agencies and may be recorded by us or by them.

***Use justifications:** contract performance; legal obligation, legitimate interests (to ensure that you fall within our acceptable risk profile); substantial public interests (prevention and detection of crime and fraud)*

Credit checks ► where we act for clients in their personal capacity, we may use Credit Reference Agencies (CRAs) to determine eligibility for certain products and services. CRAs collect and

maintain information about consumers' and businesses' credit behaviour. This includes using public registers, fraud prevention, and credit information - including details of previous applications and the conduct of your accounts - and public information such as local court judgments, decrees, and bankruptcies. The information that we and other organisations provide to CRAs about you, your financial associates and your business (if you have one) may be provided to other organisations and used by them and us to determine your eligibility for credit and credit related or other facilities such margin. If you give us false or inaccurate information, we will record this.

***Use justifications:** legal obligation; contract performance; legitimate interests (to ensure that you fall within our acceptable risk profile); substantial public interest; prevention of crime and fraud; consent.*

- **To comply with legal or regulatory requirements, or as otherwise permitted by law** ► we may process your Personal Information to comply with our regulatory requirements or dialogue with our regulators or defend or prosecute claims as applicable which may include disclosing your Personal Information to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.

***Use justifications:** legal obligations; legal claims; legitimate interests (to cooperate with law enforcement and regulatory authorities)*

- **To monitor certain activities** ► to monitor queries and transactions to ensure service quality, compliance with procedures and to combat fraud;

**Use justifications:** legal obligations, legal claims, legitimate interests (to ensure the quality and legality of our services)

- **To inform you of changes** ► to notify you about changes to our services and products;

**Use justification:** legitimate interests (to notify you about changes to our service)

- **To communicate with you regarding products and services that may be of interest** ► to provide you with updates and offers, where you have chosen to receive these. We may also use your information for marketing our own and our selected business partners' products and services to you by post, email, phone, SMS or online or social media advertisement. Where required by law, we will ask for your consent at the time we collect your data to conduct any of these types of marketing. We will provide an option to unsubscribe or opt-out of further communication on any electronic marketing communication sent to you or you may opt out by visiting [Contact Us](#) **Use justifications:** legitimate interests (to keep you updated with news in relation to our products and services); consent

- **To understand our customers and to develop and tailor our products and services** ► we may analyze the Personal Information we hold in order to better understand our clients' services and marketing requirements, to better understand our business and develop our products and services. In order to ensure that content from our website is presented in the most effective manner for you and for your device, we may pass your data to business partners, suppliers and/or service providers;

**Use justifications:** legitimate interests (to ensure the quality and legality of our services, to allow us to improve our services and to allow us to provide you with the content and services on the website)

- **To reorganize or make changes to our business** ► in the event that we (i) are subject to negotiations for the sale of our business or part thereof to a third party, (ii) are sold to a third party or (iii) undergo a reorganization, we may need to transfer some or all of your Personal

Information to the relevant third party (or its advisors) as part of any due diligence process for the purpose of analyzing any proposed sale or reorganization. We may also need to transfer your Personal Information to that reorganised entity or third party after the sale or reorganisation for them to use for the same purposes as set out in this policy;

***Use justifications:*** *legitimate interests (in order to allow us to change our business)*

- **To communicate effectively with you and conduct our business** ► to conduct our business, including to respond to your queries, to update and consolidate our records, to otherwise communicate with you, or to carry out our obligations arising from any agreements entered into between you and us.

***Use justifications:*** *contract performance; legitimate interests (to enable us to perform our obligations and provide our services to you).*

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- [4. Consent and Your Choices](#)

Most of our processing is permitted by “legal grounds” other than consent (see section 2 above). In relation to Direct Marketing (defined in Annex A), where we are required to do so, we will obtain your consent before using your Personal Information for this purpose. If you prefer not to receive our Direct Marketing communications, you can have your name deleted from our Direct Marketing see Contact Us.



In relation to processing of criminal convictions data and politically exposed person data for the purposes of complying with our anti-money laundering obligations and to combat fraud we consider that our processing is permitted by the substantial public interest ground (to prevent or detect crime) but to the extent it is not you give and we rely on your consent to process that type of Personal Information. Although you have a right to withdraw such consent at any time, as we consider the processing to be necessary for us to provide our services its withdrawal (to the extent the processing cannot be justified on substantial public interest grounds) may require us to cease to provide certain services.

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- [5. Sharing your Personal Information](#)

We will only use or disclose your 'Personal Information' (see Annex A: Definitions) for the purpose(s) it was collected and as otherwise identified in this Privacy Policy.

**Sharing outside the Riyad Bank group:** Personal Information may be provided to third parties, including anti-fraud organizations, legal, regulatory or law enforcement authorities in cases of suspected criminal activity or contravention of law, for the detection and prevention of fraud, or when required to satisfy the legal or regulatory requirements of governments, regulatory authorities or other self-regulatory organizations, or to comply with a court order or for the protection of our assets. This includes providing Personal Information to government bodies to comply with the requirements for us to screen applications in a way that ensures we are complying with the international fight against terrorism and other criminal activities (e.g. money laundering).

**Sharing within the Riyad Bank group:** We may share your Personal Information within the Riyad Bank group, including locations outside of the European Economic Area where we do business, for marketing purposes, for legal and regulatory purposes, to manage credit risk and other business risks, to perform analytics, to ensure we have correct or up to date information about you (such as your current address

or date of birth) and to better manage your relationship with us. Personal Information we may share within the group includes names and addresses of our customers or potential customers including directors and key facility parties in order to undertake money-laundering checks so that we may comply with regulations in this area.

**Business sale or reorganization:** Over time, we may buy new businesses or sell some of our businesses. Accordingly, Personal Information associated with any accounts, products or services of the business being purchased or sold will be reviewed as part of the due diligence process and subsequently transferred as a business asset to the new business owner. We may also transfer Personal Information as part of a corporate reorganization or other change in corporate control.

**Sub-contractors and agents:** We may use affiliates or other companies to provide services on our behalf such as data processing, account administration, fraud prevention and detection, analytics and marketing. Such companies will be given only the Personal Information needed to perform those services and we do not authorize them to use or disclose Personal Information for their own marketing or other purposes. We have contracts in place holding these companies to the same standards of confidentiality by which we are governed.

**Transfers outside of the EEA:** Your Personal Information may be accessed by staff, suppliers or other persons in, transferred to, and/or stored at, a destination outside the European Economic Area (EEA) in which data protection laws may be of a lower standard than in the EEA. These external organisations may process and store Personal Information abroad and may have to disclose it to foreign authorities to help them in their fight against crime (e.g. money laundering, fraud) and terrorism. We will, in all circumstances, safeguard personal information as set out in this Privacy Policy.

Where we transfer personal information from inside the European Economic Area (the **EEA**) to outside the EEA, we may be required to take specific additional measures to safeguard the relevant personal

information. Certain countries outside the EEA have been approved by the European Commission as providing essentially equivalent protections to EEA data protection laws and therefore no additional safeguards are required to export personal information to these jurisdictions. In countries which have not had these approvals (see the full list here [http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm)), we will establish legal grounds justifying such transfer, such as EU Commission-approved model contractual clauses, or other legal grounds permitted by applicable legal requirements.

Please Contact Us if you would like to see a copy of the specific safeguards applied to the export of your Personal Information.

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- [6. Retention of your Personal Information](#)

Our retention periods for personal data are based on business needs and legal requirements. We retain your Personal Information for as long as is necessary for the processing purpose(s) for which the information was collected, and any other permissible, related purpose. For example, we may retain certain transaction details and correspondence until the time limit for claims arising from the transaction has expired, or to comply with regulatory requirements regarding the retention of such data. When Personal Information is no longer needed, we either irreversibly anonymise the data (and we may further retain and use the anonymised information) or securely destroy the data.

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- [7. Maintaining the accuracy of your Personal Information](#)

We are committed to maintaining the accuracy of your Personal Information and ensuring that it is complete and up-to-date. If you discover inaccuracies in our records, or your Personal Information

changes, please notify us immediately so that we can make the necessary changes. Failure to notify us of changes to your Personal Information may negatively impact the way we communicate or provide services to you. Where appropriate, we will advise others of any material amendments to your Personal Information that we may have released to them. If we do not agree to make the amendments that you request, you may challenge our decision as described in Contact Us.

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- [8. Safeguarding your Personal Information](#)

We use physical, electronic and procedural safeguards to protect against unauthorized use, access, modification, destruction, disclosure, loss or theft of your Personal Information our custody or control.

We have agreements and controls in place with third party service providers requiring that any information we provide to them must be safeguarded and used only for the purpose of providing the service we have requested the company to perform.

***Security over the internet***

No data transmission over the Internet or website can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal information in accordance with data protection legislative requirements.

All information you provide to us is stored on our or our secure servers and accessed and used subject to our security policies and standards. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

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- [9. Changes to this Privacy Policy](#)

From time to time, we may make changes to this Privacy Policy.

This Privacy Policy at <http://www.riyadcapital.com/en/information/privacy-policy> is always the most recent version.

Please see Contact Us **to** answer any questions you may have about our Privacy Policy.

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- [10. Your Rights](#)

If you have any questions in relation to our use of your personal information, you should first contact us as per the Contact Us section below. Under certain conditions, you may have the right to require us to:

- provide you with further details on the use we make of your information;
- provide you with a copy of information that you have provided to us;
- update any inaccuracies in the personal information we hold (please see paragraph 7);
- delete any personal information that we no longer have a lawful ground to use;
- where processing is based on consent, to withdraw your consent so that we stop that particular processing (see paragraph 4 for marketing);
- object to any processing based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
- restrict how we use your information whilst a complaint is being investigated.

Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). If you exercise any of these rights we will check your entitlement and respond in most cases within a month.

*This is applied for EU Residence: If you are not satisfied with our use of your personal information or our response to any exercise of these rights you have the right to complain to the **Information Commissioner's Office** (+44 1625 545 745 or <https://ico.org.uk>)*

## Contact Us

If you have any questions or concerns about our privacy practices, the privacy of your Personal Information or you want to change your privacy preferences, please let us know.

To manage your email preferences, please get in touch with Data Protection Officer / Contact using the details below:

E-mail: [ask@riyadcapital.com](mailto:ask@riyadcapital.com)

## **ANNEX A: Definitions**

CRA is a Credit Reference Agency.

**Direct Marketing** is our communication with you such as mail, telemarketing or email, using your contact information, to inform you about products and services that we think may be of interest and value to you. This does not include communications regarding products or services that you currently have, including improved ways to use the products, or additional features of the products as well as transactional information.

**Personal Information** is information about an identifiable individual. It includes information that you have provided to us or was collected by us from other sources. It may include details such as your name and address, age and gender, personal investment records, identification numbers including your Iqamah ID/Passport and personal references, to the extent permitted by local laws.

**Riyad Bank group** means Riyad Bank in Saudi Arabia, and all other affiliates of Riyad Bank in Saudi Arabia.

## ANNEX B: Table of Legal Bases

Use of personal information under EU data protection laws must be justified under one of a number of legal “grounds” and we are required to set out the grounds in respect of each use in this policy. An explanation of the scope of the grounds available is set out below. We note the grounds we use to justify each use of your information next to the use in the “Uses of your personal information” section of this policy.

These are the principal legal grounds that justify our use of your information:

<b>Consent:</b> where you have consented to our use of your information (you may withdraw your consent by contacting us).
<b>Contract performance:</b> where your information is necessary to enter into or perform our contract with you.
<b>Legal obligation:</b> where we need to use your information to comply with our legal obligations.
<b>Legitimate interests:</b> where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.
<b>Legal claims:</b> where your information is necessary for us to defend, prosecute or make a claim against you, us or a third party.
<b>Substantial Public interest;</b> where we use Personal Information relating to criminal convictions or political affiliations for a purpose that is expressly in the substantial public interest, including for the prevention or detection of crime or fraud