



# Privacy Notice

## 1. Who Are We

Riyad Capital and its subsidiaries (or "The Capital", "we", "us" or "our") is one of the largest financial institutions in the Kingdom of Saudi Arabia and the Middle East. We provide a comprehensive range of investment products and services fully compliant with the Islamic Sharia' to meet the needs of both retail and corporate customers, including small and medium-size enterprises.

## 2. Purpose

This Privacy Notice is framed in accordance with the Personal Data Protection Law and applicable Regulations in the Kingdom of Saudi Arabia. The purpose of this notice is to explain how Riyad Capital processes your personal data, to help you understand why we collect, use, share, and store, and the steps taken to make sure it stays confidential and secure. Protecting your privacy and processing your personal data strictly in accordance with the regulatory requirements fall at the forefront of the priorities at the Riyad Capital.

## 3. What Personal Data We Collect and How We Collect It

We collect and process various categories of personal data throughout your relationship with us to achieve one or more legitimate purposes outlined in this notice. We will collect personal data from you through your direct interaction with us and in some cases the collection will be indirectly through various data collection points including but not limited to:

- Application forms.
- Riyad Capital's website.
- Digital channels.
- Direct and electronic communication (including telephone conversations) to provide our services to you.
- Your broker, intermediaries.
- Riyad Capital's Affiliates.
- Cookies.
- Device IDs.
- Publicly available resources such as online registers or directories or online publications, social media posts and other information that is publicly available.
- Business partners.

To better understand and serve you, satisfy a legal obligation, or in pursuance of another legitimate interest.

**The Personal Data types that we collect may include, but not limited to, the following:**

Type	Details
Identification Data / Information concerning your identity	Full name, gender, place and date of birth, IQAMA, Photo identification, passport information, National Insurance number, National ID card, driving license number, signature, and nationality.
Contact Information	National address or business address, email address, telephone number
Financial Information	Transactions, Income and other revenues, Account number, account statement, financial history.
Transactions	Details of payments from and to your account, including buy/sell securities and subscription/ redemption transactions detail.
Sensitive Data	Data relating to security criminal convictions and offenses, Biometric data to identify you and Health Data.
Education and employment information	Education level, name of employer, Date of Joining
Personal Relationship Data	Family members, emergency contacts, and guardians, which include their signatures, addresses and relationship with you

Data collected as part of our interactions with you / Audio recordings	Your comments, suggestions, needs, any records of phone calls between you, discussion by email, WhatsApp, live chat, exchanges on our pages on the social networks
Data from the video protection system	Including video surveillance cameras
Data concerning your devices / Geo location Data	IP address, technical characteristics, and unique identification data
Legal and regulatory requirements	Information required by the Riyad Capital for anti-money laundering in form of Know Your Customer (KYC) and Anti-Money Laundering (AML)
Cookie Information	Login information, Language settings, Website layout choices, pages visited, Time spent on the site, and clicks.
Health Data	Required health data will be collected and maintained for some insurance contracts and to meet any regulatory requirements.
Marketing	Details of any marketing preferences received from the customer
Other Information	Information collected from you when you fill in forms or by communicating with us, whether direct, by phone, email, online, or in other ways.

#### 4. On What Legal Grounds Do We Process Your Personal Data

We rely on the following lawful reasons (but not limited to) when we collect and process your personal data to operate our business, transacting with you, provide our products and services:

- **Legal Obligation:** We process personal information to comply with a legal obligation, to meet regulatory and public interest obligations or mandates.
- **Contractual agreement:** If we need to process the personal data to enter into or carry out a contractual agreement that we have with you.
- **Actual interests:** If the processing achieves actual interests for you and it is impossible or difficult to contact you.  
**Legitimate interests:** If we need to pursue our legitimate interests, without prejudice to your rights and interests, and provided that no Sensitive Data is processed.  
**Regulations and laws:** If we have to comply with the regulations and laws that are applicable to the us.  
**Vital interests:** To protect your and/or the Kingdom's vital interests.  
**Public interests or official authorities:** Achieving public interest or serving an official request from an authority according to its roles.
- **Consent:** We will only process your personal data/information with your explicit consent except for reasons permitted under the Law.

#### 5. How We Use Your Personal Data

We process your personal data for the following purposes including but not limited to, as necessary to provide relevant products and services, depending on whether you have your own Investment account with us or you represent, or are associated with, other individuals, companies, businesses or organizations who Riyad Capital with us:

- Assessing and providing products and services to through Riyad Capital obligations including our Know-your-customer (KYC) obligations, conducting credit checks and financial assessments, setting credit limits for clients and opening accounts.
- Establishing and managing relationships, administering client accounts and providing clients with appropriate access to our products and services, such as our online and mobile platforms. Verifying transactions and acting on instructions or requests, such as transferring money between accounts and making payments to third parties for clients.

- Responding to questions or managing any complaints, including monitoring social media conversations and posts to identify conversations, sentiments, and complaints about Riyad Capital and issuing notifications about changes to the terms and conditions of our products and service.
- Operating our business including managing authentication and user access controls for online and mobile, audits of business operations and creating and maintaining our credit scoring models relating to clients.
- Improving our products and services by monitoring and recording our communications with you, including phone calls, for training and quality purposes, conducting market research, customer satisfaction surveys, demographic analytics and gathering insights by aggregating data such as behavioral data from the use of our products and services and our applications to provide you with more tailored products and services.
- Detecting, investigating and preventing financial crimes by monitoring and recording voice and electronic communications and screening applications and transactions in connection with actual or suspected fraud, financial crime or other criminal activities, to detect unusual transaction behavior.
- Exercising the Riyad Capital's legal rights and conducting legal proceedings by retaining records as evidence for any potential litigation or investigation and investigating or making an insurance claim.
- Complying with applicable and relevant local and foreign laws, regulations, rules, directives, judgments or court orders, requests, guidelines, government sanctions, reporting requirements, restrictions, demands from or agreements with any authority (including domestic or foreign tax authorities), court or tribunal, enforcement agency or exchange body in any relevant jurisdiction where the Riyad Capital operates.
- Facilitating the Riyad Capital's mergers, acquisitions, and divestments by evaluating our business and providing continuity of services to you after a transfer of our business because of a merger, acquisition, sale or divestment.

## 6. Who We Might Share Your Personal Data With

Your personal data may be disclosed internally within Riyad Capital, as well as to the following entities, for the legal basis described above.

- Any joint account holders, trustees, beneficiaries authorized to receive your personal data.
- **Business Partners:** Partners with whom we collaborate, including Fintech apps and banks, enable us to enhance our Services, offering you the ability to make faster and more efficient payments.
- **Fund managers** who provide asset management services to you and any brokers who introduce you to us or deal with us for you.
- **Service Providers:** Carefully selected companies that provide services for or on behalf of us, such as companies that help us with insurance, companies that provide applications to Riyad Capital to operate our services, etc. These providers are also committed to protecting your information.
  - **Insurance Provider:** Facilitating insurance-related aspects for comprehensive coverage.
  - **Fintech Applications:** Integrating cutting-edge financial technology to enhance your experiences.
  - **Background Verification Services:** Ensuring thorough verification processes for reliable information.
  - **Logistic Service Provider:** Ensuring efficient and secure delivery logistics for account statement.
  - **Consultancy Agencies:** Providing strategic support to the Riyad Capital's operations for overall excellence.
  - **IT Service Providers:** Cloud hosting services; application development and support Services; IT Infrastructure Services; email Services etc.
- **Public or regulatory authorities:** We may be legally obligated to share your information in response to legal processes or court orders issued by government. We may also disclose your information to the relevant authorities, where we are required to disclose information by applicable law or regulation, or at their request.
- **Law enforcement authorities, government agencies,** courts, dispute resolution bodies, regulators, auditors, and any party appointed by the Riyad Capital's regulators to conduct investigations or audits of the Riyad Capital's activities.
- **Other Parties in Connection with Corporate Transactions:** In case of a merger or transfer, acquisition, or sale, or in the event of a bankruptcy, we may disclose your information to corresponding third party.
- **Other Parties with Your Consent:** In addition to the disclosures described in this Privacy Notice, we share information about you with third parties when you separately provide consent to or request such sharing.
- Any person managing your account on your behalf, including advisors (such as lawyers and accountant), brokers and persons holding an official Power of Attorney, and Legal Gaudian(s).
- **Data analysis service providers** who improve Riyad Capital's website and applications by measuring the performance of the Riyad Capital's online campaigns and analyzing the visitor's activity.
- **Fraud prevention agencies** who will also use it to detect and prevent fraud and other financial crime.

- **Social Media Agencies** so they can display messages to you about the B Riyad Capital's products and services or make sure you do not get irrelevant messages

## 7. How Long We Will Keep Your Personal Data

Riyad Capital might be required to keep your personal data for the purpose for which it was collected, processed, or requested under relevant rules and instructions in line with the regulatory requirements. This may include legal purposes, maintaining records for analysis and audit purposes, responding to inquiries or complaints, monitoring fraud and money laundering transactions, taking legal actions, and responding to regulators' requests. Retention periods for records are determined by the type of record, the nature of the activity, product or service, the jurisdictions we are in and applicable regulations. Riyad Capital will keep your personal data for a defined period after your relationship ends with us. How long we keep your personal data for might change from time-to-time based on the Riyad Capital's legal and regulatory requirements.

Riyad Capital might, in exceptional circumstances, retain your information for longer periods, particularly where we need to withhold destruction or disposal based on an order from the courts or an investigation by competent authorities and enforcement agencies or our regulators. This is so that we can produce records as evidence if required.

If you opt-out from receiving marketing materials or object to any other processing of your personal data, we may keep a record of your objection to ensure that we continue to respect your privacy and do not contact you further.

## 8. How We Keep Your Personal Data Secure

To protect your data, we have put in place state of the art security measures including appropriate administrative, technical, physical, and organizational controls to safeguard and keep your personal data confidential.

- Riyad Capital has implemented information security and data privacy policies, including incident management and reporting procedures.
- Technical measures including but not limited to data loss prevention solutions to protect personal data and to comply with legal and regulatory requirements.

We require our service providers, or other third parties we engage with and to whom we disclose your personal data to implement similar confidentiality, data privacy and security standards and measures when they handle, access, or process your personal data.

## 9. Sharing Your Personal Data Outside the Kingdom

When Riyad Capital shares your personal information outside the Kingdom, Riyad Capital will take appropriate steps to ensure that sharing of personal information are in accordance with applicable law and carefully managed to protect your privacy rights and interests, and that sharing is limited to countries which are recognized as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights and personal data.

## 10. Your rights

Riyad Capital makes all its efforts to guarantee your rights in line with the applicable regulations and standards, according to the following:

- **Right to Be Informed:** You have the right to be informed about the collection and usage of your personal data including why and how we collect your personal data, the purposes for processing your data, and who will it be shared with.
- **Right to Request Access:** You have the right to access your personal data available in Riyad Capital in a structured, readable, and clear format.
- **Right to Obtain a Copy:** You have the right to obtain a copy of your personal data available in Riyad Capital in a structured, readable, and clear format.
- **Right to Rectification:** You can request to have your personal data corrected (if inaccurate), completed (if incomplete) or updated (if out of date).
- **Right to Request Destruction:** You have the right to request that your personal data be destroyed when:
  - You consider that we no longer require the information for the purposes for which it was obtained.
  - You have validly objected to our use of your personal data.
  - Our use of your personal data is contrary to the Law or any other legal obligations.
  - You have revoked your consent to collect and process your personal data, whenever the consent is the only legal basis.
- **Right to Withdraw Consent:** You have the right to modify / revoke consent to collect and process your personal data unless statutory or legal requirements, contractual necessity and public interest require otherwise. Consent withdrawal shall not affect the processing of personal data that is based on another legal basis.

- **Right to Lodge a Complaint:** You have the right to file a complaint to the competent authority when you feel that your rights have not been met.

Riyad Capital will take appropriate steps to inform third parties of any modification or withdrawal of consent pertaining to the shared personal data.

However, there are few exceptions to consider when dealing with your data privacy rights. Here are some common exceptions:

- **Right to Access:** If providing access will not affect the rights of others, such as intellectual property rights and trade secrets, and that personal data is not disclosed to other data subjects. Riyad Capital may also restrict this right as per the cases stipulated in applicable laws and regulations.
- **Right to Obtain a Copy:** Riyad Capital may restrict this right as per the cases stipulated in applicable laws and regulations.
- **Right to Rectification:** If Riyad Capital, acting as a data controller, can't verify that the requested changes are accurate, they might not be obligated to rectify it. Riyad Capital may also restrict this right as per the cases stipulated in applicable laws and regulations.
- **Right to Destruct:** If a law or regulation mandates retaining the data, or the personal data is relevant to ongoing or potential legal dispute, then Riyad Capital is required to retain it. This could include financial records for tax purposes or medical data for health compliance. Riyad Capital may also restrict this right as per the cases stipulated in applicable laws and regulations.
- **Restriction:** Riyad Capital might not be able to restrict processing entirely if the personal data is needed for legal purposes.

To make a request concerning your rights or to make an inquiry, please contact us. See the **CONTACT US** section.

## 11. Protection of Children's and Legally Incompetent's Personal Data

Riyad Capital's website and applications are intended for use only by persons who are at least 18 years of age and/or legally competent. If the data subject is under 18 or legally incompetent, a parent or legal guardian should agree on behalf of him/her, as Riyad Capital requires consent in connection with the collection and processing of the data subject's personal data.

## 12. Your Responsibilities

You are responsible for making sure the information you give us is accurate and up to date, and you must inform us if anything changes as soon as possible.

If you give Riyad Capital personal data that belongs to another person (for example, a joint account holder, a beneficiary under an insurance policy or a dependent, etc.), you will need to inform them of this data privacy notice and obtain their agreement for Riyad Capital to use their personal data for the specified purpose.

## 13. Social Media Content Use Terms and Conditions

We kindly urge you to refrain from sharing personal data on the Riyad Capital's social media platforms, including Facebook, Instagram, YouTube, and X.

## 14. Changes to our Data Privacy Notice

This Privacy Notice was last updated 09-2024. This Privacy Notice may be updated as required, and we will inform customers of these updates. Riyad Capital recommends that you revisit the website and review the notice on a regular basis to stay informed of any changes. When you continue to use Riyad Capital's website and e-platforms after the date of posting the updated notice, you acknowledge acceptance of all modifications introduced in this Privacy Notice.

## 15. Contact Us

You can contact us if you have any inquiries or concerns with regard to this Privacy Notice and your rights by reaching out to Data Protection Officer at [MyPrivacy@riyadcapital.com](mailto:MyPrivacy@riyadcapital.com)