



PRIVACY POLICY-2026

PRIVACY POLICY INTRODUCTION

MENA CAPITAL FINANCIAL MARKETS L.L.C. ("Mena Capital", "we", "us", or "our") is committed to protecting the privacy and confidentiality of personal data collected through our websites and in the course of providing our services. Safeguarding the personal and financial information of our customers current and former as well as our website visitors is a core priority.

This Privacy Policy explains what information we collect, how we use, disclose, store, and protect it, and the choices available to you, in accordance with applicable data protection laws. By accessing any website operated by Mena Capital or its affiliates, or by opening or maintaining an account with us, you acknowledge and consent to the practices described in this Policy.

COLLECTION AND RETENTION OF YOUR PERSONAL INFORMATION

Lawful Bases for Processing

MENA CAPITAL FINANCIAL MARKETS L.L.C. ("the Company", "we", "us", "our") processes personal data in accordance with applicable laws and regulations on the following legal grounds:

- Performance of a contract: to provide requested services, including account onboarding and management, identity verification, trade execution, statements and confirmations, funding and withdrawals, and customer support.
- Legal and regulatory obligations: to comply with financial-services requirements, Anti-Money Laundering (AML) obligations, sanctions screening, and reporting duties to competent authorities.
- Legitimate interests: to enhance security, prevent and detect fraud and abuse, improve service quality, protect platform integrity, and ensure the orderly operation of our business.

How We Collect and Use Personal Information

We collect personal information directly from you and indirectly through your interactions with us and our platforms. We use this information to:

- Verify your identity and establish, administer, and service your trading account.
- Provide account statements, trade confirmations, and related communications.
- Facilitate deposits, withdrawals, and other account funding activities.
- Address service, support, and operational needs.



- Inform you were permitted about new or existing products, services, and promotions that may be of interest.
- We limit collection to information that is necessary for the provision of our products and services.

Categories of Personal Information Collected

Most information is provided directly by you and may include (without limitation):

- Personal and contact details: name, residential address, date of birth, telephone number, email address.
- Regulatory verification data: passport or other government-issued identification and related KYC documentation.
- Financial information: trading-account details, annual income, net worth, risk capital, bank-account details, and payment card information.
- Technical and usage data: IP address, browser type, operating system, internet service provider, and related telemetry generated by your interaction with our websites, portals, and applications.

You have the right to request a copy of the most current version of your personal information held by us and to request corrections, amendments, or updates to ensure accuracy.

If you choose to close your account, we will retain your personal information solely to meet regulatory requirements. We may continue to contact you about products, services, or promotions; you can opt out of such communications at any time.

Retention and Secure Disposal

MENA CAPITAL FINANCIAL MARKETS L.L.C. retains personal data in line with UAE law and regulatory standards for a minimum of five (5) years, and only for as long as necessary to fulfil the purposes described in this Policy, comply with legal and regulatory requirements, and resolve disputes. Where a longer retention period is required by applicable law, supervisory direction, or an ongoing investigation, we will retain relevant records for the longer period.

Once the retention period expires or data is no longer required, we will securely delete or anonymise the information to protect confidentiality and comply with data-protection requirements.

DISCLOSURE WITHOUT SOURCED THIRDPARTIES

MENA CAPITAL FINANCIAL MARKETS L.L.C. ("the Company", "we", "us", "our") may disclose personal, financial, and account-related information to outsourced third-party service providers for the limited purpose of facilitating and enhancing our operations, as



permitted by applicable laws and regulations. These providers support essential functions such as account processing, transaction execution, client service, compliance monitoring, fraud prevention, risk assessment, customer-satisfaction surveys, and data analytics.

No Sale of Personal Information

We do not sell, license, lease, or otherwise disclose your personal information to any third party except as described in this Policy and in accordance with applicable law.

Operational Disclosures and Joint Marketing

To support the products and services we offer, we may share your personal and account information with:

- **Outsourced third-party service providers**, including vendors that prepare and mail statements, issue transaction confirmations, perform data processing, execute transactions, provide IT/hosting, support client service, and deliver marketing services on our behalf; and
- **Financial institutions and partners** with whom we have joint marketing agreements, including those involved in marketing financial services or products that we jointly offer, endorse, or sponsor.

We may also share basic client information (e.g., name, address, phone number, email) across internal departments and with outsourced and affiliated third parties to analyse and identify client needs, inform clients about relevant product and service offerings, and conduct general marketing and market research always subject to applicable law and your communication preferences.

Confidentiality and Security Obligations

We generally require all outsourced third parties with whom we share non-public information to:

- Maintain confidentiality and use the information solely for the specific, contracted purpose or as otherwise required by law;
- Implement appropriate technical and organisational measures to protect against unauthorised access, use, disclosure, alteration, or destruction; and
- Comply with applicable data-protection obligations, including any instructions we issue as controller of the personal data.

Where required by law, our arrangements include contractual safeguards (e.g., data-processing terms, audit/assessment rights, and incident-notification obligations). If information is accessed from or transferred to another jurisdiction, we will apply lawful transfer mechanisms and safeguards consistent with applicable requirements.



Regulatory and Legal Disclosures

We may disclose personal information to regulatory authorities or law-enforcement agencies as permitted or required by applicable law. This includes responding to subpoenas, court orders, official requests, or taking steps necessary to protect our rights, property, clients, or the integrity of our operations.

Security of Your Personal Information

MENA CAPITAL FINANCIAL MARKETS L.L.C. ("we", "us", "our") is committed to safeguarding the confidentiality, integrity, and availability of your personal, financial, and account information. We apply layered controls physical, electronic, and procedural to protect data against unauthorised access, use, disclosure, alteration, or destruction and to provide a safe and secure trading environment.

1) Governance and Access Controls

- **Least-privilege access:** Personal data is accessible only to authorised personnel who require it to perform defined job functions.
- **Segregation of duties:** Sensitive activities (e.g., authorisation vs. execution) are separated to reduce risk.
- **Identity and access management:** We use multi-factor authentication (MFA) and other verification measures to strengthen account security.
- **Credentials:** When you open an account, you receive a unique account number, user ID, and password to access our systems securely. Certain employees may reset passwords but cannot view stored passwords.

2) Technical and Organisational Safeguards

- **Encryption in transit and at rest:** Sensitive information is encrypted during transmission and storage to prevent unauthorised access.
- **Transport security:** Our websites and platforms use industry-standard TLS/SSL certificates on payment pages, online applications, and secure areas.
- **Network and system security:** Firewalls, endpoint protection, and hardened configurations are deployed across our environment.
- **Monitoring and testing:** We conduct regular security audits, penetration testing, and risk assessments to detect and remediate vulnerabilities.
- **Data minimisation:** We collect only what is necessary to provide our services and meet legal obligations.
- **Secure disposal:** Personal, financial, and account data including payment-card details where applicable are disposed of securely in line with our data-retention policy.



3) Employee Responsibilities and Confidentiality

- **Confidentiality obligations:** Employees are bound to maintain confidentiality and follow established procedures for safeguarding client data.
- **Training and awareness:** Staff receive ongoing training on data protection, secure handling, and incident reporting.

4) Vendor and Legal Compliance

- **Standards and best practice:** Our controls align with recognised international security practices and applicable data-protection laws.
- **Third-party safeguards:** Outsourced providers must implement appropriate technical and organisational measures, use data only for contracted purposes, and protect it from unauthorised access, use, or disclosure.
- **Regulatory adherence:** We process personal data lawfully, including to meet AML/CFT and other regulatory requirements.

5) Safeguarding Your Account and Authorized Access

Clients are solely responsible for safeguarding their account credentials, including passwords and security-related details. Under no circumstances should these credentials be shared, disclosed, or provided to unauthorized third parties. Any individual granted access to a client's account assumes full responsibility for all actions undertaken, and the client accepts liability for any resulting consequences.

For corporate or institutional accounts, authorized representatives may be designated to manage the account on behalf of the entity. However, it remains the client's responsibility to ensure that such individuals maintain the security of account access credentials and do not engage in unauthorized activities. Clients must provide Mena Capital with the details of any designated representatives and promptly update this information as needed. Additional documentation or verification may be required to confirm their authority.

6) Incident Reporting

If you suspect your account or website access has been compromised or notice any unauthorised activity contact MENA CAPITAL FINANCIAL MARKETS L.L.C. immediately so we can take appropriate security measures and mitigate potential risks.

CHANGES TO THIS PRIVACY POLICY

MENA CAPITAL FINANCIAL MARKETS L.L.C. ("we", "us", "our") may update, modify, or



amend this Privacy Policy from time to time to reflect changes in legal, regulatory, or operational requirements, including (without limitation) applicable laws and regulations of the United Arab Emirates and the rules, regulations, decisions, circulars, and directives issued by the Capital Market Authority (CMA).

How we will notify you:

Any revised Policy will be published on our website with an updated "Last Updated" date. Where law requires enhanced notice or consent (for example, material changes that affect your rights or the way we process your personal data), we will provide appropriate advance notice and, where required, obtain your explicit consent before such changes take effect.

Effective date and acceptance:

Changes become effective on the date they are posted (or on a later stated effective date). Your continued use of our website, products, or services after that date constitutes your acknowledgment and acceptance of the revised Privacy Policy.

Version control:

We encourage you to review this Policy periodically to remain informed about how we protect your personal data. Prior versions may be made available upon request where legally permissible.

For any queries regarding this Privacy Policy or its updates, contact us at info@menacapital.ae