PRIVACY POLICY

Company	**GoldTakas FZCO**
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This Privacy Policy shall be read in conjunction with GoldTakas FZCO's Information Security and Data Protection Policy, AML/CFT Policy, Client Acceptance Policy, Code of Ethics and Business Conduct Policy, Whistleblowing Policy and other applicable policies and procedures.

This Policy explains how GoldTakas FZCO ("GoldTakas", the "Company", "we", "us" or "our") collects, uses, discloses, retains and otherwise processes Personal Data in connection with its business activities.

The Information Security and Data Protection Policy establishes the Company's internal information security, confidentiality, access management and data protection control framework. This Privacy Policy does not duplicate those controls and instead establishes the principles governing the Company's Processing of Personal Data and the information provided to Data Subjects regarding such Processing.

1. PURPOSE

The purpose of this Policy is to establish a clear and proportionate framework governing the Processing of Personal Data by GoldTakas and to provide transparency regarding:

- the categories of Personal Data processed by the Company;
- the purposes for which Personal Data is processed;
- the circumstances in which Personal Data may be disclosed;
- international transfers of Personal Data;
- retention of Personal Data;
- the rights of Data Subjects; and
- how privacy-related requests or concerns may be raised.

GoldTakas is committed to Processing Personal Data lawfully, fairly, transparently and only to the extent reasonably necessary for legitimate business, contractual, legal, regulatory and compliance purposes.

2. SCOPE

This Policy applies to Personal Data processed by GoldTakas in connection with its business activities, including Personal Data relating to:

- existing and prospective Clients;
- beneficial owners, shareholders, directors, authorised signatories and representatives of Clients;
- suppliers, refiners, counterparties and Business Partners;
- representatives and personnel of Third Parties;
- Employees and prospective Employees, where applicable;
- visitors to the Company's premises or digital channels; and
- other individuals whose Personal Data is lawfully processed in connection with the Company's activities.

This Policy applies irrespective of whether Personal Data is collected directly from the Data Subject or obtained from another lawful source.

3. REGULATORY FRAMEWORK

This Policy has been prepared with reference to:

- Federal Decree-Law No. 45 of 2021 Regarding the Protection of Personal Data, as amended or supplemented from time to time;
- other applicable UAE data protection and privacy requirements;
- applicable DMCC requirements; and
- GoldTakas's internal policies and procedures.

Where applicable legal or regulatory requirements impose stricter obligations than this Policy, those requirements shall prevail.

GoldTakas's privacy obligations shall also be interpreted consistently with legal and regulatory requirements applicable to its activities, including AML/CFT, sanctions, responsible sourcing, record-keeping and regulatory reporting obligations.

4. DEFINITIONS

Personal Data: Any information relating to an identified or identifiable natural person.
Data Subject: The natural person to whom Personal Data relates.
Processing: Any operation or set of operations performed on Personal Data, including collection, recording, organisation, storage, use, disclosure, transmission, retrieval, amendment or deletion.
Sensitive Personal Data: Personal Data which is subject to enhanced protection under applicable law due to its nature.
Third Party: Any person or entity other than the Data Subject or GoldTakas that may lawfully receive or process Personal Data.
Data Breach: Any unauthorised or unlawful access, disclosure, loss, alteration, destruction or misuse of Personal Data.

Other capitalised terms used but not defined in this Policy shall have the meaning assigned to them under applicable GoldTakas policies or applicable law.

5. PRIVACY PRINCIPLES

- **Lawfulness, Fairness and Transparency:** Personal Data shall be processed on an appropriate basis and in a manner that is fair and reasonably transparent to the Data Subject.
- **Purpose Limitation:** Personal Data shall be collected for specified and legitimate purposes and shall not be used in a manner materially incompatible with those purposes unless permitted or required by law.
- **Data Minimisation:** Personal Data collected and processed shall be limited to what is reasonably necessary for the relevant purpose.
- **Accuracy:** Reasonable measures shall be taken to maintain Personal Data that is accurate and, where necessary, up to date.
- **Retention Limitation:** Personal Data shall not be retained for longer than required by applicable legal, regulatory or legitimate business requirements.
- **Confidentiality and Security:** Personal Data shall be protected in accordance with the Company's Information Security and Data Protection Policy.
- **Accountability:** GoldTakas shall maintain appropriate governance, records and controls to demonstrate compliance with applicable privacy requirements.

6. PERSONAL DATA WE MAY PROCESS

Depending on the nature of the relationship, GoldTakas may Process the following categories of Personal Data:
Identification and Contact Information: Name, date of birth, nationality, passport or identification details, address, telephone number, email address, signature and similar identifying information.
Professional and Corporate Information: Job title, employer, directorships, shareholdings, authorised signatory status, ownership interests, corporate affiliations and information relating to beneficial ownership or control.
Financial and Transaction Information: Bank account details, payment information, transaction records, Source of Funds, Source of Wealth and information necessary to understand the nature and purpose of transactions or business relationships.
Compliance and Due Diligence Information: KYC/CDD/EDD information, beneficial ownership information, sanctions and PEP screening results, adverse media information, risk assessments and other information required for AML/CFT, sanctions, fraud prevention, responsible sourcing or other regulatory purposes.

Communications and Relationship Information: Business correspondence, enquiries, requests, complaints and other communications exchanged with GoldTakas.
Technical and Security Information: Information reasonably generated through the use of Company systems, digital channels or premises where necessary for security, access management, fraud prevention or legitimate operational purposes.

GoldTakas shall not intentionally collect Personal Data that is not reasonably relevant to its business, contractual, legal or regulatory purposes.

7. SOURCES OF PERSONAL DATA

GoldTakas may obtain Personal Data:

- directly from the Data Subject;
- from a Client, employer, company, representative or authorised person with whom the Data Subject is associated;
- through KYC, CDD, EDD and onboarding processes;
- from public registers and official databases;
- from sanctions, PEP and adverse media screening sources;
- from regulators, government authorities or competent authorities where permitted;
- from Business Partners, suppliers, service providers and counterparties;
- from publicly available and reliable sources; and
- through the Data Subject's interactions with GoldTakas.

Where Personal Data is obtained indirectly, GoldTakas shall Process such information only where there is an appropriate purpose and basis for doing so.

8. PURPOSES OF PROCESSING

GoldTakas may Process Personal Data where reasonably necessary to:

- establish, manage and administer business relationships;
- identify and verify Clients, UBOs, authorised representatives and other relevant persons;
- perform KYC, CDD and EDD;
- conduct sanctions, PEP and adverse media screening;
- assess Client, transaction, geographic and supply-chain risks;
- verify Source of Funds and Source of Wealth;
- execute, administer and record transactions;
- manage payments, accounting, invoicing and reconciliation;
- perform responsible sourcing and supply-chain due diligence;
- prevent, detect and investigate fraud, money laundering, terrorist financing, proliferation financing, sanctions evasion and other financial crime;
- comply with legal, regulatory, court, law-enforcement and competent-authority requirements;
- make regulatory filings and reports, including where required under AML/CFT or sanctions requirements;
- respond to enquiries, complaints and requests;
- manage contractual and commercial relationships;

- establish, exercise or defend legal claims;
- conduct internal compliance, audit and risk-management activities;
- protect the legitimate interests, systems, personnel and assets of GoldTakas; and
- fulfil other lawful purposes reasonably connected with the Company's business activities.

GoldTakas shall not use Personal Data for a materially unrelated purpose unless such Processing is permitted by applicable law.

9. BASIS FOR PROCESSING

GoldTakas shall Process Personal Data only where an appropriate basis exists under applicable law.

Depending on the circumstances, Processing may be necessary:

- with the Data Subject's consent, where consent is the appropriate basis;
- to enter into or perform a contract;
- to comply with applicable legal or regulatory obligations;
- to protect public interests or other interests recognised under applicable law;
- for the establishment, exercise or defence of legal claims; or
- on another basis permitted under applicable data protection legislation.

Where consent is relied upon, it shall be obtained and managed in accordance with applicable legal requirements.

GoldTakas shall not rely on consent where Processing is necessary to comply with mandatory AML/CFT, sanctions, regulatory reporting, record-retention or other legal obligations.

Withdrawal of consent does not require GoldTakas to delete, cease Processing or withhold information that it is legally or regulatorily required to retain or Process.

10. AML/CFT AND REGULATORY PROCESSING

As a regulated business operating in the precious metals sector, GoldTakas is required to collect and Process certain Personal Data for AML/CFT, sanctions, financial crime prevention and responsible sourcing purposes.

Such Processing may include information relating to:

- identity and beneficial ownership;
- ownership and control structures;
- Source of Funds and Source of Wealth;
- PEP status;
- sanctions screening;
- adverse media;
- transactions and payment activity;
- geographic exposure;
- supply-chain relationships and provenance; and
- internal risk assessments and compliance investigations.

Personal Data processed for these purposes may be retained, reviewed or disclosed where required by applicable law or competent authorities.

Nothing in this Policy shall be interpreted as requiring GoldTakas to provide information to a Data Subject where disclosure is prohibited or restricted by applicable AML/CFT, sanctions, tipping-off, investigation or other legal requirements.

This section is limited to the privacy consequences of compliance Processing. The underlying CDD, EDD, screening, risk assessment and suspicious transaction reporting requirements remain governed by the relevant GoldTakas compliance policies and procedures.

11. DISCLOSURE OF PERSONAL DATA

GoldTakas may disclose Personal Data, where reasonably necessary and legally permitted, to:

- regulatory and supervisory authorities;
- law-enforcement agencies, courts and government authorities;
- the UAE Financial Intelligence Unit and other competent authorities where applicable;
- banks and financial institutions involved in transactions;
- professional advisers, auditors and legal advisers;
- screening, compliance and due diligence service providers;
- technology, hosting and other operational service providers;
- insurers;
- logistics, storage and other service providers where relevant;
- Group companies where there is a legitimate and lawful business need; and
- other Third Parties where disclosure is required or permitted by law.

GoldTakas does not sell Personal Data.

Third Parties receiving Personal Data on behalf of GoldTakas shall be subject to appropriate confidentiality, contractual, legal or regulatory requirements, as applicable.

Third-party information-security controls and access requirements are governed by the Company's Information Security and Data Protection Policy and are therefore not duplicated in this Policy.

12. INTERNATIONAL TRANSFERS

Due to the international nature of GoldTakas's business, Personal Data may, where necessary, be transferred to or accessed from jurisdictions outside the UAE.

GoldTakas shall undertake international transfers only where permitted under applicable law and shall apply appropriate safeguards or other lawful transfer mechanisms where required.
The necessity and proportionality of the information transferred shall be considered having regard to the purpose of the transfer and applicable legal, regulatory and compliance obligations.

International transfers required for AML/CFT, sanctions, regulatory, legal or competent-authority purposes shall be handled in accordance with the applicable legal framework.

13. DATA RETENTION

GoldTakas shall retain Personal Data only for as long as necessary to satisfy the purpose for which it was collected and applicable legal, regulatory, contractual, investigation, audit or legitimate business requirements. Where Personal Data forms part of AML/CFT, CDD/EDD, transaction, compliance or regulatory records, the applicable mandatory record-retention period under the relevant law or GoldTakas policy shall apply.

Accordingly, a Data Subject's request for deletion shall not require deletion of Personal Data that GoldTakas is required or lawfully entitled to retain.

Where no further lawful retention requirement applies, Personal Data shall be securely deleted, destroyed or anonymised, as appropriate.

Detailed information-security requirements governing storage and secure disposal remain subject to the Information Security and Data Protection Policy.

14. DATA SUBJECT RIGHTS

Subject to applicable law and any lawful restrictions or exemptions, a Data Subject may have rights in relation to Personal Data processed by GoldTakas, including the right to:

- obtain information regarding the Processing of Personal Data;
- request access to Personal Data;
- request correction or updating of inaccurate Personal Data;
- request deletion of Personal Data where legally applicable;
- request restriction or cessation of certain Processing where applicable;
- object to or request review of certain automated Processing decisions, where applicable;
- request transfer of Personal Data where applicable; and
- withdraw consent where Processing is based on consent.

These rights are not absolute.

A request may be restricted, deferred or refused where permitted or required by applicable law, including where necessary to comply with AML/CFT, sanctions, regulatory reporting, record-retention, investigation, legal-claim or other statutory obligations.

GoldTakas may take reasonable steps to verify the identity and authority of a person making a privacy request before disclosing or modifying Personal Data.

15. AUTOMATED PROCESSING

GoldTakas may use systems and compliance tools to support screening, transaction monitoring, risk assessment and other control activities.

Where automated Processing is used, GoldTakas shall apply appropriate oversight consistent with applicable legal and regulatory requirements.

Compliance alerts, screening results or automated risk indicators shall not necessarily constitute final determinations and may be subject to review by appropriately authorised personnel in accordance with the relevant GoldTakas policy or procedure.

16. INFORMATION SECURITY AND DATA BREACHES

GoldTakas maintains organisational and technical measures designed to protect Personal Data against unauthorised access, disclosure, alteration, loss, misuse or destruction.

The detailed requirements governing information security, access management, confidentiality, Third-Party security, incident reporting and Data Breach management are established under the Information Security and Data Protection Policy and related procedures.

Actual or suspected information-security incidents or Data Breaches shall be managed, escalated and, where legally required, notified in accordance with applicable law and those internal requirements.

17. PRIVACY REQUESTS AND CONCERNS

Questions, requests or concerns regarding the Processing of Personal Data by GoldTakas may be submitted to:
GoldTakas FZCO
Email: compliance.ae@goldtakas.com

GoldTakas shall assess privacy requests in accordance with applicable law and may request information reasonably necessary to verify the identity or authority of the requester.

Privacy complaints shall be reviewed and appropriately documented and escalated where necessary.

18. GOVERNANCE AND RESPONSIBILITIES

Senior Management is responsible for approving this Policy and supporting the implementation of an appropriate privacy governance framework.

Compliance Function is responsible for:

- overseeing the implementation and interpretation of this Policy;
- monitoring relevant privacy and data protection requirements;
- coordinating Data Subject requests;
- supporting privacy-related assessments and escalations;
- maintaining appropriate privacy records; and
- escalating material privacy matters to Senior Management where appropriate.

Employees are responsible for:

- Processing Personal Data only for authorised business purposes;
- respecting confidentiality and privacy requirements;

- avoiding unnecessary collection or disclosure of Personal Data;
- complying with applicable Company policies and procedures; and
- promptly escalating privacy concerns or suspected Data Breaches through the appropriate internal channel.

Detailed information-security responsibilities remain governed by the Information Security and Data Protection Policy.

19. THIRD-PARTY PROCESSING

Where GoldTakas engages a Third Party to Process Personal Data on its behalf, the Company shall take reasonable and proportionate measures to ensure that the Processing is appropriately governed.

Depending on the nature and risk of the Processing, such measures may include:

- appropriate due diligence;
- contractual privacy and confidentiality obligations;
- restrictions on use and disclosure;
- appropriate requirements relating to retention and deletion;
- international-transfer provisions where applicable; and
- cooperation in relation to Data Subject requests, incidents and regulatory requirements.

Information-security assessment and access controls applicable to Third Parties shall be governed by the Information Security and Data Protection Policy and other applicable Third-Party due diligence requirements.

20. MONITORING AND REVIEW

The Compliance Function shall periodically assess whether the Company's Processing of Personal Data remains consistent with this Policy and applicable legal and regulatory requirements.

This Policy shall be reviewed at least annually and whenever there is a material change in:

- applicable privacy or data protection requirements;
- the Company's Processing activities;
- business operations or technology materially affecting Personal Data; or
- the Company's internal compliance framework.

Material amendments shall be subject to the appropriate approval process.

21. POLICY HIERARCHY AND FINAL PROVISIONS

This Privacy Policy forms part of GoldTakas FZCO's overall governance and compliance framework.

It shall not replace or override:

- the Information Security and Data Protection Policy;

- AML/CFT Policy;
- Risk Assessment and Scoring Policy;
- Client Acceptance Policy;
- applicable CDD, sanctions or suspicious transaction reporting procedures; or
- any mandatory legal or regulatory requirement.

Where this Policy and another internal policy address the same matter, they shall, to the extent reasonably possible, be interpreted consistently and according to their respective subject matter.

Where an inconsistency exists between an internal policy and applicable law or regulatory requirements, the applicable legal or regulatory requirement shall prevail.

This Policy shall become effective upon approval by Senior Management or on such later date as may be specified in the approval record and shall remain effective until amended, replaced or withdrawn.