

# KING STREET

## KING STREET (MENA) LIMITED CLIENT'S DATA PRIVACY NOTICE

Dear Client,

With this Privacy Notice, King Street (MENA) Limited (hereinafter referred to either as 'KSML' or 'the Firm') aims for transparency regarding how and why we collect and process Personal Data about you during and after your relationship with us, in accordance with the DIFC Data Protection Law No. 5 of 2020 (DPL 2020). The protection of your data and of your rights is our priority.

### **What are Personal Data?**

In the course of our contractual relationships, we collect Personal Data, that is to say:

- Contact information: your name, data of birth, address and contact details, a copy of your identity card or passport, and tax identification number; and
- Other personal information generated in the course of our contractual relationship.

Personal Data may also "Special Category Personal Data", which refers to information relating to racial or ethnic origin, communal origin, political affiliation or opinions, religious or philosophical beliefs, criminal records or lawsuits, trade union membership and health or sex life (including genetic or biometrics data where it is used for the purpose uniquely identifying you).

The Firm may request additional information as a result of developments in our contractual relationship or as required by law.

### **If you fail to provide personal information**

If you choose not to provide the information we need as a business or to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

### **Why do we process your Personal Data?**

KSML collects, processes, and stores such data primarily to meet the DIFC Data Protection regulatory requirements, especially in connection with conducting preliminary screening of prospects pursuant to the Dubai Financial Services Authority (DFSA) Rules including the fight against money laundering and terrorist financing. According to those requirements, KSML is required to have in-depth knowledge of their clients' identities.

KSML also uses such information to meet its contractual obligations. If you object to such processing, KSML will unfortunately be unable to provide you with Financial Services you require.

For any other utilization of your Personal Data, you will be asked to provide us with your express consent.

### **What processing is performed?**

The first step in handling your Personal Data is to collect the information directly from you. KSML may also collect such data from third parties, such as public registers or service providers. The information is then recorded in your file and held in safekeeping. Organizational measures of surveillance and access control, as well as technical measures of encryption are taken to protect your Personal Data against any intrusion, tampering or loss.

Your information will be used solely by authorized employees of the Firm to meet regulatory and contractual obligations or to provide you with certain Financial Services you require, and other forms of utilization may be possible, too, subject to your consent.

Your information may be transmitted to a Data Processor, agent or third party, but only if they have the same level of regulatory obligation with regard to protecting Personal Data which are compatible to the DIFC Data Protection Law and regulations. KSML will not transmit your information to any country that does not offer adequate protection without first obtaining appropriate guarantees.

### **Data Sharing**

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. For example, we may share your Personal Data with:

- affiliates;
- third-party service providers and consultants (e.g., for administrative, compliance, research or other services);
- courts, tribunals, and regulatory authorities; and
- parties authorized by you in writing, subject to your consent.

Our affiliates and third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with the law as defined in DPL 2020 and our instructions.

### **How long will your information be stored?**

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we Process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements. Our Retention Policy governs retention periods. KSML is not authorized to delete your information before the expiry of the legally required retention period.

### **Direct Marketing**

We may use your Personal Data to offer you products and services that we believe may interest you. If you do not wish to receive marketing offers from us, you can let us know by emailing us at [dataprotection@kingstreet.com](mailto:dataprotection@kingstreet.com). Note however that we have no control over the way social media sites target and market our paid advertising, to its audience.

### **Your Rights Under DPL 2020**

You may request the following at any time:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us to continue to process it. You also have

the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal data. You have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example, if you want us to establish its accuracy or the reason for processing it.
- **Data portability** enables you to receive or request transfer of the data you have provided us in a structured, commonly used and machine-readable format.
- **Object to automated processing, including profiling** which produces legal or other seriously impactful consequences concerning you.
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You may object to the use of your data for marketing purposes at any time, without stating any reasons.

### **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Contact using the email provided below. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **To inform us of changes**

It is important that the personal information we hold about you is accurate and, where necessary, kept up to date. Please keep us informed if your personal information changes during your working relationship with us and respond promptly to our request for updates of your data.

### **Data Protection Contact**

We have appointed a Data Protection Officer to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal information, please contact the Data Protection Officer. You have the right to make a complaint at any time to the relevant authority that safeguards your interests. If in doubt who that is, please consult the Data Protection Officer.

#### **Data Protection Officer Contact Details**

**Neehal Shah**

[dataprotection@kingstreet.com](mailto:dataprotection@kingstreet.com)

+442070040140

#### **Changes to this Privacy Notice**

We reserve the right to update this Privacy Notice at any time. We will circulate the most updated Privacy Notice via email/post/physical hand delivered. We may also notify you in other ways from time to time about the processing of your personal information where we process your data outside of the published Privacy Notice.

#### **Further information**

**If you have any questions about this Privacy Notice, please contact the Data Protection Officer on [dataprotection@kingstreet.com](mailto:dataprotection@kingstreet.com).**