



ADSS PRIVACY NOTICE

This privacy notice explains how we, the ADSS Group (ADSS), process your personal information when you use our services such as our website, app, content and features, or otherwise engage with us online or offline.

The ADSS entity responsible for your personal information is the one you have approached to provide services to you in your region.

Individuals in the United Kingdom (UK) should read the "For UK Individuals" section and individuals in the United Arab Emirates (UAE) should read the "For UAE Individuals" section.

If you are under 18 years old (UK) or under 21 years old (UAE), you must not access our services. Our core services involve financial risk-taking and are neither suitable nor intended for those underage.

If you have any question about your data protection rights or if you do not understand anything explained in this notice, please contact us by email to complianceuk@adss.com (UK) or compliance@adss.com (UAE).

1. Who does this privacy notice apply to?

This notice applies to:

- our users who access our website, app, content, features or other online services;
- our prospective customers identified as such by us or our third parties;
- our registered users who are our customers;
- our suppliers and business partners;
- our job applicants; and
- anyone else who interacts with us, when you call, email or visit us or otherwise interact with us.

This notice applies to you if you act in your personal capacity, for example, as our customer, and if you act in your professional capacity, for example, as an employee or agent of our supplier.

2. What types of personal information do we process?

Generally, "**personal information**" means any information that identifies you or relates to you, except for anonymised information that cannot reasonably be linked back to you.

Personal information will include your name, login details, transaction details, payment details, the details of your enquiry and other information that is obviously about you. However, it may also include technical device, browser or app data, such as your IP address, your movement on the website, information about how you engage with our services and similar information. Based on your online visits, we may observe or infer information about your preferred content, features, trading style and other interests, even without you telling us. For more on personal information, please see the categories of personal information below.

You can exercise your rights in relation to all personal information about you as set out below.

3. Why do we process your information?

The section below explains what personal information is necessary for each purpose. We keep our processes and data collection under review and will update this notice should any personal information no longer be necessary for the given purpose.

The lawful basis column explains how we comply with a technical legal justification for data processing under data protection laws. Please contact us if you have any questions.

Purpose & description	Personal information	Lawful basis for processing (UK individuals)	Lawful basis for processing (UAE individuals)
<p>To assist with your enquiries.</p> <p>For example, our sales team may respond to your request for a demo or our compliance team may respond to your legal enquiry or complaint.</p>	<p>General details Account details Details of your query</p>	<p>Necessary for our legitimate interest in responding to enquiries, complying with the law and best practices or, as the case may be, necessary for taking steps prior to entering into a contract or the performance of our contract with you.</p>	<p>Your consent or, as the case may be, as is necessary for taking steps prior to entering into a contract at your request or the performance of our contract with you.</p>
<p>We may record our calls with you for compliance, transaction records and crime prevention purposes.</p> <p>For example, we may record calls in and out of our sales team and any dealing instructions.</p>	<p>General details Account details Details of your query</p>	<p>Necessary for our legitimate interest in documenting enquiries and business transactions for compliance, governance and crime prevention purposes.</p>	<p>Your consent.</p>
<p>To provide our services to you, such as our website, app, client portal, trading platform, market data and other content.</p> <p>For example, when you visit our website, your browser will provide your IP address, browser type and other technical information to enable us displaying our content in a compatible manner. If you login we will verify your account name, password and multifactor authentication data before granting access.</p>	<p>General details Account details Device and browser details Usage data</p>	<p>Necessary for our legitimate interest in providing our services to the public and our customers, complying with the law and best practices or, as the case may be, necessary for the performance of our contract with you as our customer and compliance with our legal obligations.</p>	<p>Necessary for the performance of our contract with you or compliance with our legal obligations.</p>
<p>To enable you to set up and maintain your user account, carrying out a credit reference check and service appropriateness check.</p> <p>For example, we will request your documentation to verify your identity and comply with our "know your customer" responsibilities. We will request information about your experience as investor to assess which services are appropriate for you. We will carry out checks for anti-money laundering, fraud prevention and similar purposes and share your information with credit reference agencies and similar organisations. A record of any fraud or money laundering risk will be retained by such organisations, and may result in others refusing to provide products or services to you.</p>	<p>General details Identity details Replies to our questionnaire Account details Payment details</p>	<p>Necessary for the performance of our contract with you, compliance with our legal obligations and to satisfy our legitimate interest in acting as a responsible broker, knowing our customers, complying with best practice or applicable laws.</p>	<p>Necessary for the performance of our contract with you or compliance with our legal obligations.</p>

Purpose & description	Personal information	Lawful basis for processing (UK individuals)	Lawful basis for processing (UAE individuals)
<p>To enable you to fund and use your account by paying a deposit and purchasing services. For example, our third party payments vendor will collect your payment card information if you make a deposit.</p>	<p>General details Account details Payment details</p>	<p>Necessary for the performance of our contract with you.</p>	<p>Necessary for the performance of our contract with you.</p>
<p>To send you service communications about matters relevant to your use of our services and your engagement with us, such as surveys or other forms of active engagement, prize draws, availability of new services, changes in our terms, transaction records, etc.</p>	<p>General details Account details</p>	<p>Service communications are necessary for the performance of our contract with you or, as the case may be, necessary for our legitimate interest in satisfying your requests, facilitating our services and organising related activities.</p>	<p>Necessary for the performance of our contract with you.</p>
<p>To assess your job application and for business administration purposes. For example, if you apply for a job, we will review your CV, publicly available information about you, information from your previous employers, professional references, criminal and credit check and other information. We may use automated decision-making to eliminate applicants who fail to meet the basic criteria for a role.</p>	<p>General details Details of your query Public data Third party data Special categories data</p>	<p>Necessary for our legitimate interest in responding to you query and, as the case may be, necessary for taking steps prior to entering into a contract. Special categories data may be processed as is necessary in the context of employment and social security laws.</p>	<p>Your consent or, as the case may be, as is necessary for taking steps prior to entering into a contract at your request or the performance of our contract with you or compliance with our legal obligations.</p>
<p>To understand our audiences and customer profiles for product and service development, research, market intelligence, marketing, advertising, content personalisation and business administration, as described below. Depending on purpose, we use your profile information in anonymised or pseudonymised or, when it comes to marketing by say email, identifiable form, e.g. your email address. In some cases, this will include information observed or inferred from your activity or other information about you.</p>	<p>General details Account details Device and browser details Usage data Transaction data Public data Preferences and interests Engagement information Third party data Opportunity records</p>	<p>Necessary for our legitimate interest in understanding our typical customer profiles and demographics, for service development, research, market intelligence, marketing, advertising, content personalisation and business administration. Where required by law, we rely on your consent to deploy cookies or similar technologies on your device or to read information on your device except where necessary for essential services (please see our cookies notice).</p>	<p>You consent.</p>

Purpose & description	Personal information	Lawful basis for processing (UK individuals)	Lawful basis for processing (UAE individuals)
<p>To develop our features, services and organisation based on our anonymised surveys and audience data, reports and third party tools which rely on pixels or similar scripts to measure relevant events.</p> <p>For example, we deploy a tool which shows where your mouse travels on our website to measure the popularity of our content and features. Analytics tools help us understand your country, age group, pages visited before and after and other statistical demographic information about you and other users. Anonymous website statistics are used to decide which part of our services are not popular or may need further development to cater for our primary markets. In limited cases, it may be necessary to use your pseudonymised information to develop personalisation and similar features.</p>	<p>Anonymised audience data</p> <p>In limited cases (e.g. to develop personalisation features) pseudonymised customer profile data.</p>	<p>Necessary for our legitimate interest in product development and keeping our services relevant.</p> <p>Where required by law, we rely on your consent to deploy cookies or similar technologies on your device or to read information on your device except where necessary for essential services (please see our cookies notice).</p>	<p>You consent.</p>
<p>To conduct industry research for internal and external use.</p> <p>For example, anonymous transaction statistics allow us release reports about what asset types in what volumes are trending with retail customers.</p>	<p>Anonymised audience data</p>	<p>Necessary for our legitimate interest in utilising industry knowledge for strategic business decisions as well as sharing knowledge with the public.</p>	<p>You consent.</p>
<p>To send you risk management messages or restricting scope of our services based on your risk profile, which may include automated tools.</p>	<p>Pseudonymised customer profile data</p>	<p>Necessary for our legitimate interest in acting as a responsible broker and understanding our customer risk profiles and necessary for compliance with our legal obligations.</p>	<p>Necessary for compliance with our legal obligations or to protect your interests as our customer.</p>

Purpose & description	Personal information	Lawful basis for processing (UK individuals)	Lawful basis for processing (UAE individuals)
<p>To send you relevant marketing communications about our existing and new products and services by email, text, push, post or other channels if you sign up for a demo or if you are our existing customer.</p> <p>Our marketing tools rely on cookies and similar scripts to track your interaction with our marketing messages, such as open rates or content clicked on, to optimise campaign performance.</p>	<p>General details Account details</p>	<p>We rely on your consent if you sign up or on soft opt-in (presumed consent) if you are our existing customer. You can unsubscribe at any time.</p> <p>Where required by law, we rely on your consent to deploy cookies or similar technologies on your device or to read information on your device except where necessary for essential services (please see our cookies notice).</p>	<p>You consent.</p>
<p>To display relevant advertisements on websites, apps, social media and other inventory. Our advertising tools rely on cookies, similar scripts and advertising ID solutions and complex automated processes and decision-making. However, we use pseudonymised information that does not include your name or similar information, except in limited cases where your details such as your email address is needed to identify you on social media for advertising purposes.</p> <p>We rely on your customer profile data to understand your interests and preferences known, observed and inferred to design marketing and advertising campaigns that are relevant to you (also known as “profiling”, “personalisation” and “predictive analytics”), use an ID such as your hashed email address to identify you within third party datasets without actually disclosing your email and allocate your profile to relevant audience segments (also known as “matching”, “data enrichment”, “targeting”) or matching you against our typical customer profile (creating “lookalike audiences”), and measuring conversion events linked to your advertising ID to optimise campaign performance.</p>	<p>General details Pseudonymised customer profile data</p>	<p>Where required by law, we rely on your consent to deploy cookies or similar technologies on your device or to read information on your device except where necessary for essential services (please see our cookies notice).</p> <p>Some of our marketing and advertising activities are necessary for our legitimate interest in understanding your interests from the information available to us, information observed or inferred and third party information, in promoting our business and understanding campaign metrics.</p>	<p>You consent.</p>

Purpose & description	Personal information	Lawful basis for processing (UK individuals)	Lawful basis for processing (UAE individuals)
<p>To deliver personalised news, market insights, notifications and other content to you based on your investment interests.</p> <p>The feature relies on numerous datapoints concerning you, your trading behaviour and the content you look at online. This will include information such as your age, industry, country of residence, currency, content browsing history, time spent on content, but also your investment portfolio, details about your trading instructions, profit, how often you fund your account, your balance and other information.</p> <p>The information is ingested by our partner Alphastream in encrypted and pseudonymised form and analysed using its proprietary algorithm to create your profile which is then allocated in audience segments. Once we establish your areas of interest we source and present you and other customers in the same audience segments with relevant content from third party content providers and the Internet.</p> <p>Alphastream.io Limited acts as our service provider. It will also anonymise your data for its own legitimate purposes such as product development. Please see https://alphastream.io/privacy-policy for more information.</p>	<p>Pseudonymised customer profile data</p>	<p>Necessary for our legitimate interest in providing a competitive service with useful and innovative features.</p> <p>Where required by law, we rely on your consent to deploy cookies or similar technologies on your device or to read information on your device except where necessary for essential services (please see our cookies notice).</p>	<p>You consent.</p>
<p>To manage our professional relationship with you using our record management systems and engagement tools, identifying opportunities, contacting you by phone and sending you marketing communications.</p>	<p>General details Details of your query Professional opportunity records</p>	<p>Necessary for our legitimate interest in understanding and maintaining our business relationships and administering our business. You have the right to unsubscribe from marketing at any time.</p>	<p>Your consent or, as the case may be, as is necessary for the performance of our contract with you.</p>

Purpose & description	Personal information	Lawful basis for processing (UK individuals)	Lawful basis for processing (UAE individuals)
<p>To ensure proper administration of our organisation, including to:</p> <ul style="list-style-type: none"> • keep appropriate records about how our services are used; • resolve complaints; • conduct troubleshooting; • conduct equality monitoring; • ensure the health & safety and make reasonable adjustments to accommodate special needs; • register interactions with our communications, such as emails; • enforce our terms; • debt collection; and • similar purposes. 	<p>All information as is necessary and proportionate for the administration of our organisation</p>	<p>Necessary for our legitimate interest in the proper administration of our organisation and services and necessary for compliance with our legal obligations or activities in the substantial public interest.</p>	<p>Necessary for the performance of our contract with you or, as the case may be, as is necessary to establish, exercise or defend legal claims or comply with our legal obligations.</p>
<p>To engage our third party service providers who may process your personal information on our behalf to facilitate the provision of our services and the fulfilment of essential service functions which we cannot fulfil ourselves, such as web hosting, cloud storage, IT, analytics, payments, plugins, communications, accounting, security, CCTV and others as well as our advisors such as lawyers, accountants, insurers and others.</p>	<p>All information as is necessary and proportionate to enable the relevant service</p>	<p>Some activities are necessary for the performance of our contract with you, others are necessary for our legitimate interest in ensuring the proper operation of our services.</p>	<p>Necessary for the performance of our contract with you or compliance with our legal obligations.</p>
<p>To introduce you to third parties who will provide additional services if you expressed an interest or requested such services.</p>	<p>All information as is necessary and proportionate to enable the relevant third party service</p>	<p>Some activities are necessary for the performance of our contract with you, others are necessary for our legitimate interest in providing you a good user experience, or subject to your consent.</p>	<p>Your consent or, as the case may be, as is necessary for the performance of our contract with you.</p>
<p>To share information with our affiliated companies. For example, we may outsource certain functions to our affiliated companies or engage in group-wide marketing campaigns.</p>	<p>All information as is lawful, necessary and proportionate</p>	<p>Necessary for our legitimate interest in using our group's resources to organise, develop and deliver our services, run our organisation and decide on future strategies.</p>	<p>Necessary for the performance of our contract with you or compliance with our legal obligations.</p>

Purpose & description	Personal information	Lawful basis for processing (UK individuals)	Lawful basis for processing (UAE individuals)
To share information with public authorities or regulators to comply with our legal obligations as a financial services regulated firm.	All information as is lawful, necessary and proportionate	Where processing or sharing your data is necessary for compliance with a legal obligation to which we are subject, or, where necessary and proportionate, in order to satisfy our legitimate interest in complying with best practice or applicable laws.	Necessary for the performance of our contract with you or, as the case may be, for compliance with our legal obligations.
To ensure health and safety at our premises. For example, depending on circumstances, we may introduce additional procedures to protect our staff from transmissible diseases.	Special category data relating to health	Necessary for our legitimate interest in ensuring the health and safety of our staff and others, to comply with best practice or necessary for compliance with our legal obligations or activities in the substantial public interest.	Necessary for compliance with our legal obligations, to protect public health as required by law, or necessary to protect you and your interests.
To ensure the safety of people, security of our premises, the security of our systems and online services. For example, we may monitor our networks, website, systems and premises for suspicious activities, test and audit our systems and deploy appropriate security measures.	Device and browser details Usage data CCTV data	Necessary for our legitimate interest in ensuring the security of our organisation, people and services and necessary for compliance with our legal obligations.	Necessary for compliance with our legal obligations or licence conditions, or to protect you and your interests.
To monitor interactions and operations for the prevention and detection of crime including fraud, and share information with law enforcement authorities and other stakeholders.	All information as is lawful, necessary and proportionate	Necessary for our legitimate interest in detecting and preventing fraud and illegal conduct and necessary for compliance with a legal obligation to which we are subject.	Necessary for compliance with our legal obligations or necessary to establish, exercise or defend legal claims.
To share data with another organisation in accordance with the law for the purposes of a joint venture, collaboration, financing, sale, merger, reorganisation or similar event relating to our organisation.	All information as is lawful, necessary and proportionate	Necessary for our legitimate interest in acting in the best interest of our shareholders and investors and complying with our legal obligations.	Necessary for compliance with our legal obligations.

Purpose & description	Personal information	Lawful basis for processing (UK individuals)	Lawful basis for processing (UAE individuals)
<p>To process and share information as is required for our compliance with the law or to establish, exercise or defend legal claims.</p> <p>To process and share information with other third parties where required by law, such as regulators, law enforcement agencies or where mandatory under a court order.</p>	All information as is lawful, necessary and proportionate	Where processing or sharing your data is necessary for compliance with a legal obligation to which we are subject, to establish, exercise or defend legal claims, or, where necessary and proportionate, in order to satisfy our legitimate interest in complying with best practice or applicable laws.	Where processing or sharing your data is necessary for compliance with a legal obligation, or to establish, exercise or defend legal claims.

We will update you about any new purposes of processing of your personal information from time to time, and we will obtain your prior consent for such new purposes where we are required to do so at law.

4. Who else gets to see your data?

Where required in connection with the purposes set out above, we will share your personal information with third parties where it is necessary, proportionate and lawful, including with:

- our third parties that provide services or advice to us;
- our marketing, advertising and analytics partners including Google, Adobe, Facebook, Salesforce and others;
- our affiliated companies;
- your agent such as a broker or advisor who interacts with us on your behalf;
- third parties who provide additional services, features or content to you;
- tax, regulatory and other authorities to comply with our legal obligations or best practice;
- credit reference, anti-fraud agencies, law enforcement and other stakeholders;
- persons or authorities where we are compelled by law, responsible practices or for legal claims;
- the relevant entity in case of a merger, acquisition or collaboration; and
- other third parties where you have provided your consent.

5. Third parties may process your personal information

Our services may contain links to other websites, third party services, such as Twitter, Facebook, LinkedIn, Instagram, YouTube and plugins. Some of the third parties who we share your personal information with, such as credit reference agencies, payment services providers or public authorities, process your personal information for their own purposes.

You should check the privacy statements of these third parties and we are not responsible for how they may process your personal information. Some of our third party service providers may use your anonymised personal information for business administration and product development purposes.

6. How long is your personal information kept?

We will keep your personal information for as long as is necessary for the purposes listed above or longer, as may be required by law or for legal claims. You may contact us for further details or request deletion of your personal information at any time.

The table below illustrates what general retention periods may apply to specific categories of personal information. However, the periods may vary depending on circumstances in accordance with the law.

Category of personal information	Retention period
Account details, general details, call recording data, transaction data	Up to 10 years after account closure/last interaction depending on legal and regulatory requirements
CCTV data	30 days from capture
Device and browser details, engagement information, preferences and interests, third party data, usage data	2 years from collection
Professional opportunity records	6 years from collection
Payment details	Processed by our payment provider. Direct debit details will be kept for the duration of the mandate.
Special categories personal information	Generally, not retained or only kept for the duration of the relevant event.

7. How do we secure your personal information?

We maintain appropriate organisational and technological safeguards consistent with best international standards to help protect against unauthorised use, access to or accidental loss, alteration or destruction of the personal information we hold.

We also seek to ensure our third-party service providers do the same. We only appoint service providers under appropriate contract who provide sufficient guarantees about data security in accordance with applicable law.

We will endeavour to use the least amount of personal information as is required for each purpose. We will employ pseudonymisation and anonymisation techniques, where appropriate.

Where appropriate, we apply security measures such as encryption or hashing when sharing your personal information with third parties.

Our staff will access your personal information on a "need to know" basis.

8. Where is your personal information processed?

Depending on where you reside, your personal information will be held in the UK or the UAE, as applicable.

However, we may transfer your personal information to our affiliates, suppliers, business partners and other third parties in countries different to your country of residence, including the UK, UAE, EU or US.

Each of our recipients is subject to appropriate safeguards such as due diligence and the standard contractual clauses or similar contract for international transfers of personal information.

9. Opt-out

If you would like us to stop sending you marketing communications and to process your personal information for direct marketing purposes, please contact us.

You can request to stop receiving our marketing communications at any time by clicking on the unsubscribe link at the bottom of each marketing message and we will add you to a suppression list or otherwise arrange that you no longer receive marketing communications.

10. Categories of Personal information

Category of personal information	Description
User account details	Username, password, and similar information.
CCTV data	Image data recorded by our CCTV.
Call recording data	A recording of your calls with us.
Details of your query	Information in your query, complaint, job application or other communication.

Category of personal information	Description
Device and browser details	Information automatically provided by your device and browser including mobile device ID, internet protocol (IP) address, cookie ID, online identifiers, operating system, browser type, language, time zone setting, location and date and time of access.
Engagement information	Information about your engagement with our emails and other communications or with our content on the Internet including open rates, click rates, view rates, active time spent, survey data, feedback data and similar information.
General details	Your name, date of birth, address, email, telephone number, email address, nationality, countries of residence, power of attorney, net income, net worth, sources of funds, PEP status, role and employer details if you are acting in your professional capacity and similar information.
Identity details	Your passport details, image, social insurance number, tax payer ID and similar information.
Professional opportunity records	Your personal and professional details as business customer and other opportunity records.
Payment details	Payment card, bank account details and similar information.
Preferences and interests	Information about your preferences and interests known, observed or inferred from various sources.
Public data	Publicly available information about you.
Special categories data	Except for health and safety, diversity monitoring or for other important reasons, we do not process information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
Third party data	Information provided by third parties about your interaction with our posts and content and 'likes' on social media platforms, such as Twitter, Facebook or Instagram, your preferences and interests received from our advertising and analytics partners, references from your previous employer, referees, membership organisations and other third parties.
Transaction data	Information about the transactions you make in our services.
Usage data	Information about how you navigate and engage with our online services, features including online activity data such as downloads, clickstream data with URLs visited previously, page interaction, such as scrolling, clicks, and mouse-overs, methods used to browse away from our website, information in security logs and similar information.

11. Data protection officer

Our Data Protection Officer can be contacted by post to Outsourced Data Protection LLP, 71 Queen Victoria Street, London, EC4V 4AY or email to contact@prodpo.com.

12. Updates

If we make any changes to our notice, you will be able to see them on this page. You should regularly check for updates, as indicated by the "Last updated" date at the top.

If you do not agree with the changes, please do not continue to use our website or services. Of course, if any such changes significantly affect you, we will ask for your prior consent where we are required to do so by law.



13. For UK individuals

This section provides further disclosures and describes the rights in relation to your personal data that you may have under UK data protection law if you are an individual in the UK.

A. Controller

ADS Securities London Limited will process your personal information as “controller” for the purposes and under the legal grounds for processing set out above.

ADS Securities London Limited is authorised and regulated in the UK by the Financial Conduct Authority (FRN 577453). Registered as a company in England and Wales, number 07785265 with registered address at 125 Old Broad Street, London EC2N 1AR. VAT Registration Number: 212 722 447.

B. Personal data

“Personal data” means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

C. Data subject rights

Subject to certain exemptions, limitations and appropriate proof of identity, you will generally have the following rights in relation to your personal data:

- Right to information about matters set out in this notice. You may also contact us for further details about our data retention policy and international data transfers.
- Right to make an access request to receive a copy of your personal information held by us.
- Right to rectification of any inaccurate or incomplete personal information.
- Right to withdraw consent previously provided.
- Right to object to our processing of personal information based on our legitimate interests such as processing for direct marketing purposes.
- Right to erasure of personal information that is no longer needed, for example, if you object to our profiling for advertising or personalisation purposes and also request erasure.
- Restriction on the processing of personal information, for example, where necessary while we deal with your enquiry.
- Right to human intervention in respect of any automated decision-making without human involvement that significantly affected you.
- Right to data portability from one service provider to another, where applicable.
- Right to lodge a complaint with the Information Commissioner’s Office.

All requests will be processed without undue delay and no later than within one month. If we cannot process your request within this period, we shall explain why and process it as soon as possible thereafter.

14. For UAE individuals

This section provides further disclosures and describes the rights in relation to your personal data that you may have under UAE’s Federal Decree-Law No. 45 of 2021 called the Personal Data Protection Law if you are an individual in the UAE.

A. Controller

ADS Securities L.L.C. will process your personal data as “controller” for the purposes and on the legal grounds for processing set out above.

ADS Securities L.L.C. (“ADSS LLC”) is a limited liability company incorporated under United Arab Emirates law. The company is registered with the Department of Economic Development of Abu Dhabi (No. 1190047) and has its principal place of business at 8th Floor, CI Tower, Corniche Road, P.O. Box 93894, Abu Dhabi, United Arab Emirates. ADSS LLC is licensed by the Central Bank of the United Arab Emirates to act as a financial and monetary intermediary in the conduct of financial and monetary brokerage business for the sale and purchase of currencies and intermediating in money market transactions as permitted in accordance with Central Bank



Resolution Number 126/5/1995 (as amended) and to carry out certain categories of financial investment business as permitted under Central Bank Resolution Number 164/8/1994 (as amended).

B. Personal Data

“Personal data” means any data relating to an identified natural person, or one who can be identified directly or indirectly by way of linking data, using identifiers such as name, voice, picture, identification number, online identifier, geographic location, or one or more special features that express the physical, psychological, economic, cultural or social identity of such person.

C. Natural person's rights

Subject to certain exemptions, limitations and appropriate proof of identity, you will generally have the following rights in relation to your personal data:

- Right to information about matters set out in this notice. You may also contact us for further details about our data retention policy and international data transfers.
- Right to make an access request to receive a copy of your personal information held by us.
- Right to rectification of any inaccurate or incomplete personal information.
- Right to withdraw consent previously provided.
- Right to object and stop our processing for direct marketing purposes including profiling and statistical surveys, any automated processing that has legal or other serious consequences on you or any processing in breach of the law.
- Right to erasure of personal information that is no longer needed.
- Restriction on the processing of personal information.
- Right to data portability from one service provider to another, where applicable.
- Right to lodge a complaint with the UAE Data Office.

All requests will be processed without undue delay as required by applicable law.