

# **DATA PROTECTION AND PRIVACY POLICY**

## **AM Wealth Limited**

Version 2.0  
(Effective from 13.09.2024)



## DATA PROTECTION AND PRIVACY POLICY

Scope:	AM Wealth Limited	Original Issue:	31-08-2023
Issuing Department:	Authorised Management	Next revision:	once every year

### Version control

Version no:	Author:	Date and Main Changes:
Version 1.0	Svetlana Osipova, CRO	Initial version, 31-08-2023
Version 2.0	Svetlana Osipova, CRO	Annual review, 13-09-2024. Minor amendments

### Approved by the Board of Directors, 13-09-2024

Signing Authority:	Signature:
Maria Vasilyeva, Executive Director, CEO	
Svetlana Osipova, Executive Director, CRO	

## Table of Contents

1	Purpose and Scope.....	4
2	Processing Personal Data.....	4
3	Channels of Collection Personal Data.....	5
4	Types of Personal Data.....	5
5	Access to Personal Data.....	5
6	Store of Personal Data.....	6
7	Users Rights in Relation to Personal Data.....	6
8	Complaints.....	6
9	Changes to the Policy.....	7

# 1 Purpose and Scope

This Data Protection and Privacy Policy (henceforth "Policy") was created to determine the rules for the use and protection of Personal Data of users. The Policy describes what data is collected and how it will be used, when person choose to become a client and/or customer of the Company.

This Data Protection and Privacy Policy applies to anyone whose Personal Data is provided to the Company.

The Personal Data includes all data that the user has provided to the Company, as well as information received from third parties, for example, personal name data, contact details (address, telephone, postal address), exchange transaction history, financial data, any transactions with the Company and its affiliates, as well as information received from partners.

The Data Protection and Privacy Policy must be read in conjunction with constituted part of the Compliance Policy of the Company.

The term "us" or "we" refers to the AM Wealth Limited.

The term "you" or "your" refers to the user or viewer of AM Wealth Limited`s Data Protection and Privacy Policy.

Please note that there may be changes to the current Policy in the future, about which you will receive an appropriate notification. Make sure you are familiar with the new rules.

# 2 Processing Personal Data

AM Wealth Limited may process and collect your Personal Data as client or potential client for the following purposes:

- Providing suitable products and services, including, transactions or requests.
- Establishing and managing feather investment relationships.
- Monitoring and improving our website and its content.
- Conducting any type of market research in order to improve our service and products.
- Providing you with updated information, new market research etc.
- Preventing, detecting, investigating and prosecuting crimes (including but not limited to money laundering, terrorism, fraud and other financial crimes) in any jurisdiction, identity verification, government sanctions screening and due diligence checks.
- Complying with applicable local or foreign law, regulation, policy, voluntary codes, directive, judgement or court order and establishing, exercising or defending legal rights in connection with legal proceedings.
- We use cookies to store and collect information about your use of our website. Cookies are small text files stored by the browser on your equipment's hard drive. They send information stored on them back to our web server when you access our website. These cookies enable us to put in place personal settings and load your personal preferences to improve your experience.

### 3 Channels of Collection Personal Data

AM Wealth Limited uses several ways to collect personal information of its clients or potential client including but not limited to:

- E-mail and telephone contact with us;
- Any meetings that take place with the Company in person;
- Use of our website, including cookie files, applications, surveys, online forms and systems available;
- On our website or any other online applications;
- Correspondence and other documents.

### 4 Types of Personal Data

As part of our business, we collect Personal Data depending of a type relationship AM Wealth Limited and its clients or potential clients that include the following but not limited to:

- Names, and contact details such as current and previous email addresses, postal addresses, residential addresses, phone numbers and other contact information;
- Nationality, residency, date and place of birth, passport numbers and other information available on copies of identification documents such as passports and ID cards, visa information;
- Education, professional history and employment history;
- Employment status, name of the employer, office location, job title and annual income;
- Criminal records, complaints and allegations, personal opinions and reports;
- Records of correspondence including email communications;
- Payment information such as credit or debit card numbers and bank account details, transaction history information, Tax information (Taxpayer identification number), Details and proof of income / funds/ wealth;
- Device information such as your IP address as well as browsing history;

### 5 Access to Personal Data

AM Wealth Limited may disclose your Personal Data to:

- Employees of the business line(s) concerned by the products and services provided (marketing, legal and compliance, accounting and IT department(s));
- Our third-party professional advisors, service providers, agents for the purposes of providing services to us or to you on our behalf, who are under a duty of confidentiality with AM Wealth Limited;
- Court, taxation or other regulatory authority upon special request;
- Parties involved in investigations (such as firms, individuals and their legal advisers);
- Local and international registrars.

## 6 Store of Personal Data

AM Wealth Limited hold personal information via electronic or paper-based files to protect it from loss, unauthorised access, modification or disclosure. If the Company considers that this personal information is no longer needed, all the records would be destroyed. However, the Company may need to maintain records for a significant period of time. For example, anti-money laundering laws require us to retain copies and evidence of the actions taken by us in regard to your identity verification, sources of incomes and wealth, monitoring of your transactions, telephone, chat and email communications, orders and trades history, handling of your complaints and records that can demonstrate that we have acted in line with regulatory code of conduct throughout the business relationship. These records must be maintained for a period of six years after our business relationship with you has ended or even longer if we are asked by our regulators.

Personal Data collected may be transferred to, and stored at, a destination outside Abu Dhabi Global Markets. It may also be processed by staff operating outside the ADGM who work for us or for one of our suppliers or affiliate companies. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

## 7 Users` Rights in Relation to Personal Data

Under The Data Protection Regulations 2021 you have the following rights as an individual which you can exercise in relation to the Personal Data we hold about you:

- Withdraw consent;
- Access, rectify, and erase Personal Data;
- Object to the Processing of Personal Data;
- Lodge a complaint;
- Restrict the Processing;
- Data portability; and
- Non-discrimination.

## 8 Complaints

You are entitled to lodge a complaint with a competent Data Protection Authority where existing, concerning AMWL's compliance with the applicable data protection laws and regulation. If you have any questions and or need any assistance please visit the official website of Office of Data Protection - <https://www.adgm.com/operating-in-adgm/office-of-data-protection/for-individuals>

Our Data Protection Officer and how you can contact us: if you have any questions regarding this data protection Policy or the protection of your personal data, please contact AMWL's Data Protection Officer at the following: [info@amwealth.ae](mailto:info@amwealth.ae)

If you want to exercise your rights, please contact us by using the registered email address you disclosed to us. We try to respond to all requests within 1 (one) month. Occasionally, it may take us longer than 1 (one) month if your request is particularly complex or you have

made a number of requests. In this case, we will notify you within 1 (one) month of the receipt of your request and keep you updated.

## 9 Changes to the Policy

The Company may update this Data Protection and Privacy Policy from time to time. In case of any changes the revised Data Protection and Privacy Policy will be posted to the website immediately and we will post a notice on our site to notify you of such changes.

This Data Protection and Privacy Policy must be regularly reviewed and updated at least annually. The initial version of the Policy must be approved by the Board of Directors. All further updates must be approved by the Policy's owner and the CEO or Authorized Management.

This Policy is non-confidential document and shall be disclosed on the Company website.