

# TRADESIM PRIVACY POLICY

## 1 INTRODUCTION

This notice outlines how we, Radas PTT FZ-LLC (No. 104598) trading as “TradeSim”, have established measures to protect your privacy and information rights and to tell you what personal information we collect and how we use it. Our processing of personal data is governed by the Federal Decree-Law No. 45 of 2021 regarding the Protection of Personal Data (**PDPL**). We provide this notice in our capacity as a data controller under the PDPL.

## 2 YOUR PERSONAL DATA-WHAT IS IT?

Personal data is any information relating to an identified natural person or identifiable natural person.

## 3 DATA COLLECTION AND USE

The information we may collect from you includes:

- (a) Information establishing your identity (for example, name, address, email address, date of birth, passport or Emirates ID)
- (b) Financial information such as bank details and source of wealth
- (c) Information relating to your use of our website (for example, domain name, IP address and cookies)
- (d) Information relating to your use of our services (such as your preferences, investment profile, details relating to beneficiaries and dependents)
- (e) Any information you independently choose to provide to us (for example, if you send us an email or call us).

## 4 HOW DO WE OBTAIN YOUR INFORMATION

We may collect your information during the course of our relationship with you and will only use your personal information in accordance with applicable data protection laws.

- (a) We may obtain this information from a variety of sources, including:
- (b) From you (for example, when you access or purchase products or services from us, when you make an inquiry about a product or service, when you send us emails or write to us, or otherwise provide us with your personal information)
- (c) From public reference sources.

## 5 HOW WE USE YOUR INFORMATION

We may use or process your personal information for the following purposes:

- (a) To provide you with information about our products, services and events and other information that we think may be valuable to you
- (b) To facilitate the sale of our products or services to you
- (c) To manage our ongoing relationship with you
- (d) To respond to any queries, requests, or comments that you may have
- (e) To process payments
- (f) To comply with legal obligations, such as financial services and anti-money laundering regulations.

## 6 ON WHAT BASIS WE USE YOUR INFORMATION

We use your personal information on the following bases:

- (a) For our legitimate interests. Using your personal information helps us to operate, improve and minimise any disruption to our products and services that we may offer to you. We also have a legitimate interest in sending you information on the products, services and offerings we believe will be of interest to you
- (b) Because the information is necessary for the performance of a contract with you or to take steps at your request to enter into a contract
- (c) Because you have given your consent (if we expressly ask for consent to process your personal information, for a specific purpose)
- (d) To comply with legal and regulatory obligations.

## **7 WITH WHOM DO WE SHARE YOUR INFORMATION?**

We will only disclose or transfer your personal information for the purposes set out in this notice to:

- (a) Third party service providers and sub-contractors who provide a service to us (including but not limited to marketing and advertising, data processing, IT and office services)
- (b) Third party intermediaries who provide an important role in the delivery of our services (such as brokers, custodians and administrators etc.)
- (c) Any member of our group
- (d) Any competent authorities, which may be inside the Dubai Development Authority or outside it, if we are legally required to comply with a request for data.

## **8 COUNTRIES TO WHICH WE TRANSFER YOUR INFORMATION**

The information you submit may be transferred, stored and hosted outside of the Dubai Development Authority Zone or the country from which you may be accessing our website or services, and may be transferred to countries which do not have data protection laws or to countries where your privacy and other fundamental rights will not be protected as extensively. These and all other transmissions will remain secure and under our sole control.

We will implement appropriate measures to ensure that your personal information remains protected and secure when it is transferred outside the Dubai Development Authority Zone, in accordance with our obligations under the PDPL.

## **9 RETENTION OF DATA**

We will keep your data only for as long as is necessary to respond to any queries or complaints, to improve the services that we offer to you or to comply with any legal obligations to which we may be subject.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve such purposes through other means, and the applicable legal requirements.

## **10 YOUR RIGHTS**

Under the PDPL, you can contact us if you would like to:

- (a) Access your data – request a copy of your personal information that we process about you
- (b) Rectify your data – request us to amend or update your personal information where it is inaccurate or incomplete
- (c) Erase your data – request us to delete your personal information where it is no longer necessary for the purpose(s) for which your information was originally collected
- (d) Restrict your data – request us temporarily or permanently to stop processing all or some of your personal data
- (e) Object to the use of your data – at any time, object to us processing your personal information where it is based exclusively on our legitimate interests (see above) or for direct marketing purposes
- (f) Receive or transmit your data in a machine-readable and structured format (otherwise known as "data portability") – request the receipt or transmission of your personal information in a structured and machine-readable format where we are processing it on the basis of your consent or for the performance of a contract with you and by automated means
- (g) Object to any automated decision-making – request us not to subject you to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect;
- (h) Withdraw your consent – withdraw your consent at any time to the use of your personal information for a particular purpose (but if we are not relying on your consent for that purpose then we may be able to continue processing your personal data).

For any of the above, please email us at [privacy@tradesim.com](mailto:privacy@tradesim.com) or send postal mail to the following address: Radias PTT FZ-LLC, Dubai Media City Building 5, Al Sufouh, Dubai, United Arab Emirates. Subject to any overriding legal obligations, requirements and/or exemptions, we will endeavour to respond to your request within thirty (30) days of receipt, unless we require further information from you. We may ask you to provide proof of your identity.

## **11 COMPLAINTS**

If you feel that we do not comply with applicable data protection and privacy rules, you may complain to us at the address above and you also have the right to lodge a complaint with the Emirates Data Office (as established by the PDPL).

## **12 SECURITY**

We are committed to protecting the information you provide us. We have implemented security policies, rules and technical measures to protect the personal information that we have under our control, in accordance with applicable data protection laws. The security measures are designed to prevent unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **13 HYPERLINKS**

Our websites may provide links to third-party websites for your convenience. If you access those links, you will leave our website. We do not control those websites or their privacy practices, which may differ from ours. We do not endorse or make any representations about third-party websites. This Privacy Notice does not cover the personal data you choose to give to unrelated third parties. We encourage you to review the privacy policy of any company before submitting your personal information. Some third-party companies may choose to share their personal data with us; that sharing is governed by that third-party company's privacy policy.

## **14 NOTIFICATION OF CHANGES**

We may be required to update or change our Privacy Notice from time to time. We will upload an updated Privacy Notice on this website. If there are any significant changes to the Privacy Policy (e.g. if we decide to use your personal information in a manner different from that stated at the time it was collected) and we hold your email address we will notify you by way of an email.