

CFP TECHNOLOGY FZCO

Privacy Policy

09.03.2023

Amendments to this Document

From time to time this document will be updated to reflect changes that **CFP Technology FZCO (the 'Firm' or 'FZCO')** regulated business or changes to the regulations to which **FZCO** is subject. The Compliance Director will ensure that all appropriate amendments are made to this manual, and this will be overseen by the Board. The dates of the amendments are recorded below. Please ensure that you have the most up-to-date version of this manual by confirming the correct version number with the Compliance Director.

Instructions: Do not state "*Final*" as by definition policies are regularly reviewed. Terms normally used are "Draft", "Review" or "Published". Each publication supersedes the previous. Don't forget to update your "Version Control Log".

Version Control

Version	Status	Date	Notes	By Whom
0.1	Draft	02/04/16	For Application	Compliance Consultant
0.1	Version 1.0	09/03/23	For Application	CFP Technology.

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Privacy Policy

Please read our Privacy Policy carefully before using our website ("the Website"). In this Policy "we", "us" and "our" means **CFP Technology FZCO** ('FZCO') and "you" means the individual who is using the website. By using our website, you agree with the collection, the use and the disclosure of your personal data in accordance with this Privacy Policy.

We may change the content or services found on the Website at any time without notice, and consequently our Privacy Policy may change at any time in the future. Your continued access to or use of the website will mean that you agree to the changes.

Our Privacy Policy, together with the Terms of Business sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. For the purposes of the [Federal Decree Law No. 45/2021](#) on the Protection of Personal Data (the "Law"), the data controller is FZCO.

Also incorporated is the [Data Protection Law 2020](#).

Definition: What is personal data?

Personal Data: *Any data relating to an identified natural person, or a natural person who can be identified, directly or indirectly, through the linking of data, by reference to an **identifier** such as his **name, voice, image, identification number, online identifier, geographical location, or one or more physical, physiological, economic, cultural or social characteristics.***

If any data is stored, you have certain rights regarding that data. These are;

Right of Access to Information

You have the right to obtain information on the categories of personal data being processed, the purpose of the processing, the decisions made upon automated processing, entities with whom the personal data is shared.

Right to Request Personal Data Portability

You have the right to receive your personal data in a structured and machine-readable format.

Right to Rectification or Erasure of Personal Data

You have the right to rectify inaccurate personal data and the right to delete your personal data and be forgotten.

Right to Restriction of Processing

You have the right to restrict and stop the processing of your data where it is inaccurate or you object to the purpose of the processing.

Right of Processing and Automated Processing

You have the right to object to automated decisions made by automated processing of your personal data.

Cookies

To make using our website as straightforward as possible and to improve the service we offer you, we use cookies.

What are Cookies?

Cookies are harmless text files that web servers can store on your computer's hard drive when you visit a website. They allow the server to recognise you when you revisit. There are two main types:

- **Transient (or per-session) cookies**
These only exist for your website visit and are deleted on exit. They recognise you as you move between pages, for example, recording items added to an online shopping basket. These cookies also help maintain security.
- **Persistent (or permanent) cookies**
These stay on your machine until expiry or deletion. Many are built with automatic deletion dates to help ensure your hard drive doesn't get overloaded. These cookies often store and re-enter your log-in information, so you don't need to remember membership details.

We use both types of cookie.

Additionally, cookies can be first or third-party cookies. First party cookies are owned & created by the website you're viewing- in this case by FZCO. Third party cookies are owned & created by an independent company, usually a company providing a service to the website owners. In our case, third party cookies provided from this Website are still subject to the provisions set out below.

What we use cookies for

Internet cookies are common, do not harm your system and do not retrieve information about you stored on your hard drive – they just store or gather website information. They help you do things online, like remembering logon details so you don't have to re-enter them when revisiting a website.

CFPS utilize various types of cookies including necessary cookies and analytics/advertising cookies.

Necessary cookies are enabled by default but can be turned off on your device, although this may affect your browsing experience. These cookies help us to operate our website and identify any issues. Additionally, we use cookies to remember our users and provide personalized content.

Analytics and advertising cookies help us understand our website's performance and improve it as necessary.

Third-party cookies are used to recognize and count visitors, track user behavior on our website, and show relevant ads. We may share this information with other organizations, such as Google.

Specifically, we use Google Ads to track the effectiveness of our ad campaigns and Google Analytics to understand visitor behavior and track conversions. Google Tag Manager is also utilized to manage cookies on our website.

CFPS only use these cookies for the specific purposes outlined above and we do not use them to collect any personally identifiable information about our users. We take our users' privacy seriously and we are committed to complying with all relevant data protection laws and regulations.

If you wish to disable cookies, you can do so by adjusting your browser settings. Please note, however, that disabling cookies may affect your ability to use certain features on our website.

We use cookies to:

1. Gather customer journey information across our websites
2. Ensure your privacy in our secure websites
3. Store login details for our secure websites
4. Temporarily store details input into our calculators, tools, illustrations and demonstrations
5. Store details of your marketing, product and business unit preferences to improve our targeting and enhance your journey through our websites
6. Evaluate our websites' advertising and promotional effectiveness.

We use both our own (first party) and partner companies' (third party) cookies to support these activities. We don't use cookies to track people's Internet usage after leaving our websites and we don't store personal information in them others could read and understand.

No cookies used by FZCO store personally identifiable data such as:

- Names
- Phone numbers
- Email addresses
- Mailing addresses
- Bank Account Numbers

Services requiring enabled cookies

Some of our services may require cookies in your browser to view and use them and to protect your financial and personal information.

Changing your cookie settings

You are not obliged to accept cookies that we send to you and you can in fact modify your browser so that it will not accept cookies. To enable or disable cookies, follow the instructions provided by your browser (usually located within the “Help”, “Tools” or “Edit” facility). Alternatively, an external resource is available at www.allaboutcookies.org/manage-cookies providing specific information about cookies and how to manage them to suit your preferences.

Please note that should you choose to set your browser to disable cookies, you may not be able to access secure areas of this Website, for example any online accounts you may hold.

Most internet browsers accept cookies automatically, but you can change the settings of your browser to erase cookies or prevent automatic acceptance if you prefer.

These links explain how you can control cookies via your browser - remember that if you turn off cookies in your browser then these settings apply to all websites not just this one:

For more information about the cookie setting, we link the instructions for the most important browser web:

Internet Explorer™: <http://windows.microsoft.com/it-IT/windows-vista/Block-or-allow-cookies>

Safari™: <http://www.apple.com/it/support/>

Chrome™: <https://support.google.com/chrome/answer/95647?hl=it&hlrm=en>

Firefox™: <http://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cookie>

Opera™: <http://help.opera.com/Windows/10.20/it/cookies.html>

For information about the cookies that are installed on your device, about their management, and how to delete them, it is possible to visit the following website: www.youronlinechoices.com/it/

Other information relating to your computer

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report

aggregate information to our advertisers. This is statistical data about our Website users' browsing actions and patterns, and does not identify any individual.

Secure online services

Any secure online services you subscribe to with us may use cookies to enable information about you and your preferences to be stored and to prevent unauthorised access to your services and information. Cookies must usually be accepted in such circumstances - without them we cannot ensure your information is secure (and people rejecting cookies can't use the services).

How will we use the information we collect about you?

We will store and process your information on our computers wherever located and in any other medium. By "your information" we mean personal and financial information we:

- a) obtain from you or from third parties and other organisations when you apply for an account or any other product or service for which you or they give to us at any other time; or
- b) learn from the way you use and manage your account(s), from the transactions made, if any, such as the date, amount, currency and the name and type of supplier (e.g. supermarket services, medical services, retail services).

We will use your information to manage your account(s), give you statements and provide our services, for assessment and analysis (including credit and/or behaviour scoring, market and product analysis), to identify and tackle fraud, money laundering and other crime, carry out regulatory checks and meet our obligations to any relevant regulatory authority, and to develop and improve our services to you and other customers and protect our interests.

We may use your information to inform you by letter, telephone, text (or similar) messages, digital television, e mail and other electronic methods about products and services (including those of others) which may be of interest to you. Where you have neither given your consent to such marketing nor requested to opt out of such marketing, this will be limited to information about products and services similar to those which were the subject of a previous service provided to you.

If you don't want us to tell you about other products and services please write to us and supply us with your full name and address and details of any products or services you have with us. Please write to us at FZCO, Dubai Silicon Oasis, DDP, Building A2, Dubai, United Arab Emirates.

Will we share your information with anyone else?

We may share your information including how you manage your account or Website visit with relevant third parties and as permitted by law including but not limited to the following:

- People who provide a service to us or are acting as our agents, on the understanding that they will keep the information confidential.
- Anyone to whom we transfer or may transfer all or any part of our business or assets, from whom we acquire any business or assets or who acquires substantially all of the assets of FZCO PLC.
- Credit reference and fraud prevention agencies.
- We may also give out information about you if we have a duty to do in order to comply with any legal obligation, or in order to enforce or apply our terms of use or if the law allows us to do so.

If we disclose your information to a service provider (a person, office or organisation) located in another country (including locations outside of the European Economic Area), we will take steps reasonably necessary to ensure that they apply the same levels of protection as we are required to apply to your information and to use your information only for the purpose of providing the service to us. By submitting your personal information, you agree to this transfer.

How long will we keep your personal information on file?

We will retain information about you after the closure of your account or service provision for as long as it is permitted for legal, regulatory, fraud prevention, business and financial crime purposes.

Under applicable data protection legislation, you may be entitled, to a copy of the personal information you have provided. If any data is inaccurate it will be corrected without delay. Please write to us at Data Protection Manager, FZCO, Dubai Silicon Oasis, DDP, Building A2, Dubai, United Arab Emirates.

Electronic communications

Please remember that Internet communications are not secure unless the data being sent is encrypted. We cannot accept any responsibility for the unauthorised access by a third party and/or the corruption of data being sent by individuals to us. Some countries prohibit transmission of encrypted data over telephone lines. You should not encrypt data transmitted if you know doing so would contravene applicable local, national or international laws. For guidance relating to your specific situation, please contact your legal adviser.

Intellectual Property

The entire content of the Website is subject to copyright with all rights reserved and it may only be stored, held or used for your personal use only. You may not download

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Security

It is our policy that if any of our clients are victims of unauthorised access to their accounts we will cover any resulting financial loss which the Client suffers provided that the Client has not breached our security procedures.

You must ensure that viruses, trojans, worms or equivalent or similar items do not enter your computer system. We assume no responsibility for loss of whatever nature, howsoever arising, resulting from such viruses, trojans, worms or equivalent or similar items.

Calls

We may record and monitor calls made or received by us to maintain high quality service standards, to check instructions and for your protection and ours.

Your Queries

If you have any queries regarding privacy issues then please write to us at Compliance Department, FZCO compliance@cfps.co