

SafeGold Privacy Policy

At SafeGold Precious Metal DMCC ("**SafeGold**," "**we**", or "**us**"), we are committed to protecting your privacy and safeguarding your personal information. Personal Information or Personal Data are any information which are related to an identified or identifiable natural person.

This Privacy Policy (the "**Policy**") is designed to inform you about how we manage your personal data in the context of our services, which include our website, mobile applications, physical gold trading platform, and any of our services offered through our platform or that of our Partners. This commitment extends to personal data we collect in the course of our business operations, including that received directly from you ("**you**" or "**your**"), as well as information obtained through our partner entities that facilitate the use of our services through API integrations on their platforms ("**Partners**").

This Policy details our practices in collecting, storing, and using personal information and highlights the rights of individuals whose data we manage. We place a high emphasis on transparent and ethical handling of your data, whether it's sourced directly from you or through our Partners. Our aim is to ensure the responsible and confidential management of your information, aligning with both our business ethics and legal obligations, particularly in our dealings in the physical gold market.

We have considered the legal frameworks pertinent to data protection, and it may be supplemented with specific provisions relevant to different jurisdictions as required.

Protecting your personal data is not just a legal obligation for us; it is fundamental to earning and maintaining your trust. As we continue to innovate and expand our services, our focus on data privacy and security will remain a top priority.

By accessing, visiting, or using the SafeGold services, you acknowledge and consent to the practices described in this Privacy Policy. Please review this Policy carefully. If you do not agree with any aspect of this Policy, please refrain from using our services.

SafeGold Personal Information Processing

The types of personal information we processes may include:

1. **Basic Identifying Information:** Your name, role/title, contact details (including email, physical address, phone numbers), date of birth, gender, home address, correspondence address, address history, and your relationship to an individual or entity involved with us.
2. **Verification Information:** To confirm your identity, we may need details including but not limited to your birthdate, nationality, passport number and information, government identification number and scan (such as Emirates ID), and we may use publicly available resources for verification.
3. **Transaction-Related Information:** Details pertaining to your transactions or inquiries related to the purchase, sale and redemption of physical gold through our platform or via our partners.

4. **Financial Information:** Bank account or other financial details relevant to your transactions with us, provided directly by you or through one of our Partners.
5. **Technical Data:** This includes information from your visits to our Partner's or our website or app, such as your IP address, browser details, page interaction information, device information, and other technical data.
6. **Client-Provided Information:** Any personal data provided by or on behalf of our clients or generated by us in the course of providing our services, which may include sensitive personal data.
7. **Additional Personal Information:** Any other data relating to you that you may provide to us either directly or via a Partner platform.

We typically collect your personal information:

- During the initiation and maintenance of your relationship with us, whether as a customer, vendor, or Partner.
- Through your interactions with our website, app, or online services either directly or via a Partner platform.
- During your participation in our marketing initiatives or events.
- From third-party sources, such as credit agencies, regulatory authorities, fraud prevention agencies or publicly available records, for verification and compliance purposes.

Your information will be treated with confidentiality, safeguarded under our professional obligations and in accordance with applicable laws. We ensure that our personnel and service providers who may handle your personal information adhere strictly to these confidentiality obligations. To comply with our legal obligations, we may be required to share your personal information with regulatory bodies governing the jurisdiction, such as the relevant authorities in the United Arab Emirates.

Data Usage and Sharing at SafeGold

Purpose of Data Usage

At SafeGold, we uphold a stringent policy regarding the use of personal data, whether obtained directly from you or through third parties, including our Partners. Our use of your personal information is always grounded in lawful and ethical practices and is contingent upon having your consent or a lawful basis for processing. These bases include:

- **Performance of Services:** Central to our business of selling and buying physical gold, where you engage in transactions with us.
- **Legal Compliance:** Adhering to legal and regulatory obligations, including anti-money laundering regulations.

- **Vital Interests:** Protecting your essential interests or those of others in critical situations.
- **Legitimate Business Interests:** Enhancing our services, user experience, or transaction security, always balancing these against your rights and interests.

Purpose of Sharing Information

The sharing of your personal information is a thoughtful and purpose-driven process:

- **Collaboration with Delivery Partners:** We work closely with trusted delivery partners who assist in storing and delivering the physical gold that forms the core of our business. Sharing relevant information with these partners is essential to facilitate the efficient and secure handling, storage, and transportation of your gold purchases.
- **SafeGold Foundation:** To assure the ongoing protection of your gold, especially in the unlikely event of our business ceasing to exist, we have established a purpose-built foundation. This foundation is a critical part of our commitment to safeguarding your assets. Sharing necessary information with this foundation ensures that your gold is protected and managed appropriately, even in unforeseen circumstances.
- **Communication and Engagement:** We actively use your personal information to keep you informed about our latest updates, upcoming events, and marketing initiatives. This may entail including your name and organisation in attendee lists for our events or featuring your image in media content related to these events.
- **Business Transfers and Reorganisations:** In the dynamic landscape of business, should we undergo restructuring, mergers, or acquisitions, it may be necessary to transfer your personal information to other entities within our corporate group or to third parties involved. This transfer would be conducted with strict adherence to legal requirements and with the aim of maintaining continuity in our services.
- **Legal Obligations and Compliance:** To comply with legal and regulatory requirements, we may be required to share your data with legal advisors, identity verification or AML service providers, government or regulatory authorities, and other relevant entities. This sharing is integral to our commitment to lawful business conduct and to the protection of your rights and interests in legal contexts.
- **Technology and Cloud Services:** In our pursuit of offering state-of-the-art services, we utilise advanced third-party technology solutions, including cloud-based systems, CRMs, messaging gateways, etc.. This involves storing your personal information within secure cloud infrastructure, managed by reputable service providers. This approach ensures enhanced data security and operational efficiency in our digital engagements.
- **Outsourced Support:** We may outsource certain business services such as customer support to third parties and your personal data may be processed by these third parties to ensure that you have an outstanding experience when transacting with us.

We are committed to the secure and lawful handling of personal data. Our data sharing is conducted for specific, necessary purposes and in compliance with legal standards. We do not sell, rent, or distribute personal information to third parties, except as directly relevant to our services.

Our procedures are designed to safeguard confidentiality, especially in our physical gold trading operations. Personal and transactional data is shared only as needed and under strict privacy law compliance.

In all aspects of our business, from gold storage to customer transactions, we prioritise protecting the integrity and confidentiality of personal information.

Your Data Protection Rights at SafeGold

We recognize and respect your rights under data relevant protection laws. As a customer, you are entitled to the following rights concerning your personal data:

1. **Right to Be Informed:** You have the right to be informed about how your personal information is being processed by us.
2. **Right of Access:** You can request access to your personal information and details about how we process it through our customer support channels.
3. **Right to Rectification:** If your personal information is inaccurate or incomplete, you have the right to have it corrected. Please contact us through our customer support channels along with appropriate supporting documentation.
4. **Right to Object:** You may object to the processing of your personal information. In the event that you object to the processing of your personal information, you should not proceed with any transactions in relation to the product.
5. **Right to Erasure:** Also known as the 'right to be forgotten', this allows you to request the deletion or removal of your personal information where there is no compelling reason for its continued processing. This right shall be subject to any regulatory or compliance requirements.
6. **Right to Restrict Processing:** You have the right to request that we restrict the processing of your personal information under certain conditions. If you submit a request for the restricted processing of your personal information, you should not proceed with any transactions in relation to the product. This right shall be subject to any regulatory or compliance requirements.
7. **Right to Data Portability:** This right allows you to obtain and reuse your personal data for your own purposes across different services.
8. **Right to Object to Automated Decision-Making:** You have the right to object to decisions being made about you based solely on automated processing. If SafeGold cannot resolve your objections, we have the right to terminate your access to our services.
9. **Right to Withdraw Consent:** Where we rely on consent to process your personal information, you have the right to withdraw that consent at any time by informing SafeGold through its established customer care channels. However, data collected prior to the withdrawal of your consent will be processed in accordance with this Policy.

To exercise any of these rights, please contact us at dataprotection@safegold.com. We may request additional information from you to verify your identity and process your request effectively.

Cross-Border Transfer of Personal Data at SafeGold

We aim to store all personally identifiable data in the UAE. In situations where such data needs to be transferred across borders, we ensure that such data is protected to a standard equivalent to that of the UAE personal data protection laws and in compliance with applicable laws.

Our approach ensures that your personal data is protected with the same level of care and security, irrespective of geographical boundaries.

Data Retention at SafeGold

We adhere to a stringent data retention policy that balances the need to maintain information for operational purposes with our commitment to data protection.

Duration of Data Retention:

- We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, analytics or reporting requirements.
- The specific retention period for data varies depending on the nature of the information and the reasons for which it is processed.

Compliance with Legal Obligations:

- In certain instances, we may need to retain personal data for longer periods in accordance with legal obligations. For example, compliance with Anti-Money Laundering (AML) laws may necessitate the extended retention of transactional and personal data.
- We regularly review our data retention policies to ensure compliance with all applicable laws and to adjust to any changes in legal requirements.

Secure Disposal of Data:

- Once the retention period has elapsed or the need to retain the data is no longer present, we securely dispose of or anonymize personal data in accordance with our data protection policies and applicable laws.

Changes to This Privacy Policy

SafeGold reserves the right to make amendments to this Privacy Policy as necessary. Our commitment is to ensure that such changes reflect the evolving needs of our business, legal environment, and data protection best practices.

- **Communication of Major Changes:** Should there be any substantial changes to our Privacy Policy, we will proactively communicate these changes to you in advance. This is to ensure that you remain fully informed about how we handle your personal data and what changes may affect you.

- **Effective Date of Changes:** Minor amendments to this Privacy Policy will take effect immediately upon their posting on our website. We encourage you to review our Privacy Policy periodically to stay informed of any updates.
- **Regular Updates:** Our website will always host the most current version of our Privacy Policy. Regularly checking back will ensure you are aware of the most up-to-date practices and policies governing the handling of your personal data.

Contact Information for Privacy Concerns

For any inquiries, concerns, or requests regarding your personal data, please contact us at dataprotection@safegold.com. Our team is equipped to address your queries and assist you with exercising your data protection rights.