

## PRIVACY & COOKIES POLICY

CFD are a leveraged product and can result in losses that exceed deposits. Trading CFDs may not be suitable for everyone, so please ensure you fully understand the risks and take care to manage your exposure.

**Your privacy is important to us. This statement outlines our policy on how we manage the personal information we hold about our customers, potential customers, shareholders and others. It applies to WCS Limited with its registered office at Al Sila Tower, Level 21, ADGM Square, Al Maryah Island, Abu Dhabi.**

It is our policy to respect the confidentiality of information and the privacy of individuals. We are bound by the FSRA rules and regulations.

Our privacy policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any information we hold will be governed by the most current WCS privacy policy displayed on our website.

Any reference to 'us', 'our', 'we' or 'WCS' in this privacy notice is a reference to WCS Limited as the context requires unless otherwise stated.

Similarly, any reference to 'you', 'your', 'yours' or 'yourself' in this privacy notice is a reference to any of our customers, potential customers, shareholders and others, as the context requires unless otherwise stated.

### PURPOSE OF THIS PRIVACY POLICY

We are committed to being open and transparent about how we use personal information. Where our documents or interactions with you ask for personal information, we will generally state the purposes for its use and to whom it may be disclosed.

### WHY DO WE COLLECT PERSONAL INFORMATION?

Our business is to meet our customers' needs for a range of financial services. To do this effectively, we need to collect certain personal information. Please also note that because of the nature of the services we provide and our associated regulatory obligations we do not have the option of allowing you to deal with us on an anonymous basis.

### HOW DO WE PROCESS PERSONAL DATA AND WHAT KIND OF PERSONAL INFORMATION DO WE ASK FOR?

Because of the nature of the products and services provided, government regulations and taxation laws (if applicable), we ask for a range of personal information from our customers. The type of personal information we may collect can include (but is not limited to) name, address, date of birth, gender, contact details, income, assets and liabilities, account balances, trading statements, financial statements, credit reporting information, employment details, location data and any other similar information.

We obtain most of the information directly from our customers through application or other forms, and from maintaining records of information provided in the course of ongoing customer service. We may also obtain information from other sources. For example, credit information or identity checks.

We may also obtain personal information about you through your use of our website [wc-s.com](http://wc-s.com), apps or through the use of cookies on our websites and/ or apps, in particular by recording which pages you look at on our website.

We may ask for other information voluntarily from time to time (for example, through market research, surveys or special offers) to

enable us to improve our service or consider the wider needs of our customers or potential customers.

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us. Such telephone conversations may be recorded without the use of a warning tone or any other further notice.

If you choose not to provide the information we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

### VISITORS TO OUR OFFICE

Further, if you visit any of our offices or premises, we may have CCTV, which will record your image.

### HOW DO WE USE THIS INFORMATION AND WHO MAY WE DISCLOSE IT TO?

While we may send you marketing material from time to time that we think will be useful to you, we are conscious of the need to respect your privacy. Unless you are informed otherwise, the personal information we hold is used for establishing and managing your account, reviewing your ongoing needs, enhancing customer service and products and giving you ongoing information or opportunities that we believe may be relevant to you. We may also use your personal information for business planning purposes including product development and internal research.

Depending on the product or service concerned and particular restrictions on sensitive information, this means that personal information may be disclosed to:

- World Credit Savings Limited and its subsidiary/ies (including associated companies in the United Arab Emirates and

elsewhere in the world) who provide financial and other services for WCS and their clients

- service providers and specialist advisers who have been contracted to provide us with administrative, IT, financial, regulatory, compliance, insurance, research or other services
- credit reporting or reference agencies
- introducing brokers with whom we have a mutual relationship (any of whom may be within or outside UAE)
- credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law or our agreement with you
- anyone authorised by you, as specified by you or our agreement with you

**Third party service providers such as credit-referencing agencies may keep a record of any searches performed on our behalf and may use the search details to assist other companies in performing their searches.**

**We may take reasonable steps to require that organisations both within and outside WCS and its subsidiaries who handle or obtain personal information as service providers to us acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with either the ADGM rules or their local privacy regime and this privacy notice. You should be aware however that our ability to enforce ADGM Data Protection Rules or any other contractual privacy obligation against overseas recipients and to take action in relation to any breach may be very limited and/or far less effective than it would be if such recipients were UAE based.**

**Because the ADGM rules may not apply or be enforceable against some overseas recipients we understand that you may choose not to disclose your personal information to us. However, if you choose not to provide the information we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.**

## UNSOLICITED INFORMATION

If you provide us with personal information that we have not requested, then we will endeavour to only retain the information that we are otherwise entitled to hold because of the products and services we provide. However, if this additional information is surplus to our requirements but is provided to us in a manner where it is combined with information that we are either required or entitled to retain then you acknowledge that this unsolicited information may be held by us in the same manner as the balance of your personal information.

## MARKETING OUR PRODUCTS & SERVICES

As noted above, we may use your personal information to let you know about products and services or promotions or other opportunities in which you may be interested. If you no longer wish to receive such communications please phone us on +971 (0)2 446 9922, or write to us at: World Credit Savings Limited, Al Sila Tower, Level 21, ADGM Square, Al Maryah Island, Abu Dhabi, UAE, PO Box 764610 or email: [support@wc-s.com](mailto:support@wc-s.com). For marketing that you receive as a result of our use of cookies, please see the section dealing with cookies below. In particular, please note the information about how to manage your preferences both personally and with any social media websites.

## OUR WEBSITE, COOKIES AND TECHNOLOGY DEVELOPMENT

This section outlines some privacy issues specific to our website(s) and app(s). We may collect personal information you enter when using our website or our apps. This includes the use of cookies.

## WHAT IS A COOKIE AND HOW DO WE USE COOKIES?

We use cookies to give you access to certain pages of our website(s) or our app(s) without having to log in each time you visit. We may also use independent external service providers to track the traffic and usage on the website(s).

Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, where you have been on the website(s) or the app(s), when you return, where you came from, and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience on our website(s) or our app(s), including presenting web pages according to your needs or preferences.

## MANAGING COOKIES AND MARKETING

Cookies are frequently used on many websites on the internet and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of wc-s.com or our app(s) if you choose to disable the cookie acceptance in your browser, particularly the secure parts of the website. We therefore recommend you enable cookie acceptance to benefit from all the services on the website.

Please note that social media sites such as Twitter and Facebook will require you to manage your cookie preferences directly with them.

## TECHNOLOGY DEVELOPMENTS

We are constantly striving to improve functionality on our website(s). This may mean a change to the way in which personal information is collected or used. The impact of any technology changes which may affect your privacy, will be notified in this privacy notice as it may be updated from time to time.

## LINKS TO THIRD PARTY WEBSITES

Our website(s) or app(s) may have links to external third party websites that may benefit the user. Please note, however, that third party websites are not covered by our privacy notice and these sites are not subject to our privacy standards and procedures. Please check with each third party as to their privacy practices and procedures.

## SENSITIVE INFORMATION IS SUBJECT TO GREATER RESTRICTIONS

Some personal information we hold is sensitive. The way we use tax statements (if applicable) and information received from a credit reporting agency about an individual may also be restricted by law.

Sensitive information may be relevant to credit and other applications. It is our policy that sensitive information will be used and disclosed only for the purposes for which it was provided,

unless the customer agrees otherwise or the use or disclosure of this information is allowed by law.

We train our employees who handle personal information to respect the confidentiality of customer information and the privacy of individuals. We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal.

#### HOW DO WE STORE PERSONAL INFORMATION?

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, mail, over the internet or other electronic medium. We hold personal information in a combination of secure computer storage facilities and paper-based files and other records, and irrespective of the format of the information, take steps to protect the personal information we hold from interference, misuse, loss, unauthorised access, modification or disclosure.

We may need to maintain records for a significant period of time. However, when we consider information no longer needed, we will remove and details that will identify your or we will securely destroy the records.

#### PROTECTING PERSONAL DATA

As information is more commonly held in electronic form we take our obligations to protect electronically held personal information very seriously. This includes ensuring we meet regulatory requirements regarding the appropriate levels of information and software security, governance and associated procedures.

#### HOW DO WE KEEP PERSONAL INFORMATION ACCURATE AND UP-TO DATE?

We endeavour to ensure that the personal information we hold is accurate and up-to-date. We realise that this information changes frequently with changes of address and other personal circumstances. We can generally update your customer information over the telephone, by email from your registered email address or online via the electronic trading service.

#### YOU HAVE THE RIGHT TO CHECK WHAT PERSONAL INFORMATION ABOUT YOU IS HELD BY US

Under the FSRA rules, you have the right to check any personal information which we hold about you and to advise us of any perceived inaccuracy or update.

To make a request, you will need to complete an application form verifying your identity and specifying what information you require.

#### INDIVIDUAL'S PERSONAL DATA RIGHTS

We fully respect your rights to request that we:

- Allow you to opt-out of any process that you previously consented to, at any time.
- Provide a copy of data we hold on you, or pass it to the third party on your behalf.
- Amend, delete or restrict processing of your data.
- Explain and review any automated decision making or profiling.
- Provide further information about our processing activities.

If you wish to raise a Data Subject Request, please contact us using the information in the next section.

#### WHAT IF YOU HAVE A COMPLAINT?

If you consider that any action of ours breaches this privacy notice or ADGM data protection or otherwise doesn't respect your privacy, you can make a complaint. This will be acted upon promptly.

To make a complaint, please phone us on +971 (0) 2 446 9922, or write to us at WCS Limited, Al Sila Tower, Level 21, ADGM Square, Al Maryah Island, Abu Dhabi, UAE PO Box 764610 or email: [support@wc-s.com](mailto:support@wc-s.com).

If you are not satisfied with our response to your complaint, you can telephone FSRA on +971 (0) 2 333 888.

#### CONTACTING US

If you want to:

- make a general enquiry about your privacy notice
- change your personal information
- access your personal information

phone us on 02 446 9922

World Credit Savings Limited  
Level 21  
Al Sila Tower, ADGM Square  
Al Maryah Island, Abu Dhabi  
UAE

**Access Notice**

- 1) This policy will govern all dealings between us and the applicant customer ('you', 'your', 'yours' and 'yourself' as appropriate), during the application process. Once you open an account with us, your dealings with us will be governed by the applicable customer agreement for that account type.
- 2) In return for us granting you access to the Online, Trading Service, you agree to the following terms. For the purpose of this policy, 'Online Trading Services' means any electronic services (together with any related software or application) accessible by whatever means we grant you access to or make available to you either directly or through a third party service provider.
- 3) You will take all reasonable steps to ensure that no computer viruses, worms, software bombs or similar items are introduced into any computer hardware, software, applications, equipment or network facilities you use to access our Online Trading Services
- 4) We and our licensors (as the case may be) will retain the intellectual property rights in all elements of the software and such software and databases contained within our Online Trading Services and you will not in any circumstances obtain title or interest in such elements.
- 5) With respect to any market data or other information that we or any third party service provider provide to you in connection with your use of any Online Trading Services, you agree that:(a) we and any such provider are not responsible or liable if any such data or information is inaccurate or incomplete in any respect; (b) we and any such provider are not responsible or liable for any actions that you take or do not take based on such data or information; (c) such data or information is proprietary to us and any such provider and you will not retransmit, redistribute, publish, disclose or display in whole or in part such data or information to third parties except as required by applicable regulations or as agreed by us; (d) you will use such data or information solely in compliance with the applicable regulations and this policy; and (e) we may at our absolute discretion remove your access to market data at any time.
- 6) No one other than a party to this policy, their successors and permitted assignees shall have any right to enforce any of its terms.
- 7) This policy and all our dealings with you are in all respects governed by the laws of the ADGM, and the Courts of the ADGM will have non-exclusive jurisdiction to settle any disputes that may arise in relation thereto. Nothing in this term will prevent us from bringing proceedings against you in any other jurisdiction.