1. THIS POLICY

1.1. This Policy is issued by Marex Group entities, (together, "**Marex**", "**we**", "**us**" or "**our**"), and is addressed to individuals outside our organisation with whom we interact, including visitors to our websites (our "**Sites**"), customers, Personnel of corporate customers and vendors, and other recipients of our services (together, "**you**"). Defined terms used in this Policy are explained in Section 13 below.

1.2. This Policy may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law or regulation. We encourage you to read this Policy carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Policy.

2. PROCESSING YOUR PERSONAL DATA

2.1. **Collection of Personal Data**: We collect Personal Data about you from a variety of sources as follows:

(A) when you provide it to us (for example, where you contact us via email or telephone, or by any other means) for the purposes of inquiring about our products or services or where you enter into, or intend to enter into, a contract with us for the provision of products or services or for any other similar purpose;

(B) in the ordinary course of our relationship with you (for example, in the course of managing your transactions or during the on-boarding process);

(C) that you choose to make public, including via social media (for example, we may collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible);

(D) from third parties who provide it to us (for example, your employer; our customers; credit reference agencies; and law enforcement and regulatory authorities);

(E) from third parties, where you purchase any of our products or services through such third parties;

(F) when you visit any of our Sites or use any features or resources available on or through a Site. When you visit a Site, your device and browser may automatically disclose certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to a Site and other technical communications information), some of which may constitute Personal Data.

2.2. **Creation of Personal Data**: We create Personal Data about you, such as records of your interactions with us, and details of your accounts, subject to applicable law and regulation.

2.3. **Relevant Personal and Sensitive Personal Data**: The categories of Personal Data about you that we may Process, subject to applicable law, are as follows:

(A) personal details: given name(s); preferred name(s); nickname(s), gender; date of birth; age; marital status; Social Security or national insurance number; passport number(s); other government issued number(s) (tax identification number(s); driving licence number(s)); nationality; lifestyle and social circumstances; images of passports, driving licences and signatures; authentication data (passwords, mother's maiden name, challenge/response questions and answers, PINs, facial and voice recognition data); photographs; visual images; and any other data relating to your identity.

(B) family details: names and contact details of family members and dependents;

contact details: address; telephone number; email address; and social media profile details;

(C) employment details: industry; role; business activities; names of current and former employers; work address; work telephone number; work email address; and work-related social media profile details;

(D) education history: details of your education and qualifications;

(E) financial details: billing address; bank account numbers; credit card numbers; cardholder or accountholder name and details; instruction records; transaction details; and counterparty details;

(F) views and opinions: any views and opinions that you choose to send to us, or publish about us (including on social media platforms); and

(G) Electronic Identifying Data: IP addresses; cookies, activity logs, online identifiers, unique device identifiers, and geolocation data.

2.4. **Processing your Sensitive Personal Data**: We do not seek to collect or otherwise Process your Sensitive Personal Data except where:

(A) the Processing is necessary for compliance with a legal obligation (for example, to comply with any relevant diversity reporting obligations);

(B) the Processing is necessary for the detection or prevention of crime (including the prevention of fraud) to the extent permitted by applicable law and regulation;

(C) you have manifestly made those Sensitive Personal Data public;

(D) the Processing is necessary for the establishment, exercise or defence of legal rights;

(E) we have, in accordance with applicable law, obtained your explicit consent prior to Processing your Sensitive Personal Data (as above, this legal basis is only used in relation to Processing that is voluntary- it is not used for Processing that is necessary or obligatory in any way);

(F) processing is necessary for reasons of substantial public interest and occurs on the basis of an applicable law that is proportionate to the aim pursued and provides for suitable and specific measures to safeguard your fundamental rights and interests;

(G) processing is necessary to comply with Applicable Law that applies to a Controller in relation to anti-money laundering or counter-terrorist financing obligations or the prevention, detection or prosecution of any crime;

(H) Processing is proportional and necessary to protect you from potential bias or inaccurate decision making, where such risk would be increased regardless of whether Sensitive Personal Data is processed; or

(I) For any other reasons permitted under law and applicable regulations.

2.5. **Purposes for which we may Process your Personal Data**: The purposes for which we may Process Personal Data, subject to applicable law are:

(A) AML/KYC: fulfilling our regulatory compliance obligations, including 'Know Your Client' checks and confirming and verifying your identity (including by using credit reference agencies), screening against government, supranational bodies (including but not limited to the European Union, the Office of Foreign Assets Control, the United Nations Security Council and the Dubai Financial Services Authority) and/or law enforcement agency sanctions lists, internal sanctions lists and other legal restrictions;

(B) Client on-boarding: on-boarding new clients and compliance with our internal compliance requirements, policies and procedures;

(C) Credit worthiness: conducting credit reference checks and other financial due diligence;

(D) Provision of products and services to you: administering relationships and related services; performance of tasks necessary for the provision of the requested services or to perform obligations under any contract: communicating with you in relation to those services;

(E) Marketing/Prospecting: communicating with you via any means (including via email, telephone, text

message, social media, post or in person) subject to ensuring that such communications are provided to you in compliance with applicable law: and maintaining and updating your contact information where appropriate;

(F) Operation of our Sites: operation and management of our Sites; providing content to you: displaying advertising and other information to you: and communicating and interacting with you via our Sites;

(G) IT operations: management of our communications systems, operation of IT security/IT security audits;

(H) Health and safety: health and safety assessments and record keeping: and compliance with related legal obligations;

(I) Financial management sales: finance; corporate audit; and vendor management;

(J) Research, conducting market or customer satisfaction research: and engaging with you for the purposes of obtaining your views on our products and services;

(K) Security: physical security of our premises (including records of visits to our premises and CCTV recordings); and electronic security (including login records and access details, where you access our electronic systems);

(L) Investigations: detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law;

(M) Legal compliance: compliance with our legal and regulatory obligations under applicable law, including the recording of telephone lines where required;

(N) Legal proceedings: establishing, exercising and defending legal rights;

(O) Improving our products and services: identifying issues with existing products and services: planning improvements to existing products and services; and creating new products and services; and/ or

(P) Risk Management Audit: compliance, controls and other risk management.

2.6. The legal basis on which we may perform Processing of your Personal Data: The legal basis on which we may Process Personal Data, subject to applicable law are:

(A) the Processing is necessary in connection with any contract that you may enter into with us, or which we are required to take prior to entering into a contract with you;

(B) the Processing is necessary for compliance with our regulatory obligations, including and not limited to, the regulatory obligations mandated by the Dubai Financial Services Authority;

(C) the processing is necessary to protect your vital interests or of another person;

(D) we have a legitimate interest in carrying out the Processing for the purpose of improving our products or services (to the extent that such legitimate interest is not overridden by your interests or fundamental rights and freedoms); and / or

(E) we have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary, it is not used for Processing that is necessary or obligatory in any way).

3. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

3.1. We may disclose your Personal Data to other entities within the Marex Group, for legitimate business purposes (including providing services to you and operating our Sites), in accordance with applicable law. In addition, we may disclose your Personal Data to:

(A) you and where appropriate, your family, your associates and your representatives;

(B) clients and customers of our businesses;

(C) credit reference agencies;

(D) anti-fraud services;

(E) data aggregation services;

(F) accreditation bodies;

(G) governmental, legal, regulatory, or similar authorities, ombudsmen, and central and/or local government agencies, upon request or where required, including for the purposes of reporting any actual or suspected breach of applicable law or regulation;

(H) accountants, auditors, financial advisors, lawyers and other outside professional advisors to Marex, subject to binding contractual obligations of confidentiality;

(I) debt-collection agencies and tracing agencies;

(J) third party Processors (such as payment services providers; shipping companies; etc.) located anywhere in the world, subject to the requirements noted below in this Section 4;

(K) any relevant party, claimant, complainant, enquirer, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights in accordance with applicable law;

(L) any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including safeguarding against and the prevention of threats to public security in accordance with applicable law;

(M) any relevant third-party acquirer(s) if we sell or transfer all or any relevant portion of our business or assets (including in the event of a re-organisation, dissolution or liquidation);

(N) the press and the media; and / or

(O) voluntary and charitable organisations.

3.2. Our Sites may use third party plugins or content. If you choose to interact with any such plugins or content, your Personal Data may be shared with the third-party provider of the relevant social media platform. We recommend that you review that third party's privacy policy before interacting with its plugins or content.

3.3. If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

4. INTERNATIONAL TRANSFER OF PERSONAL DATA

4.1. Because of the international nature of our business, we may need to transfer your Personal Data within Marex, and more broadly within the Marex Group, and to third parties, as noted in Section 3 above, in connection with the purposes set out in this Policy. For this reason, we may transfer your Personal Data to other countries that may have different laws and data protection compliance requirements, including data protection laws of a lower standard to those that apply in the country in which you are located.

4.2. The DIFC has recognised the countries listed at **https://www.difc.ae/business/operating/data-protection/adequate-data-protection-regimes/** as having adequate level of protection for your data and we may accordingly transfer your data to such countries subject to applicable laws and regulations.

4.3. Where we transfer your Personal Data to countries not listed above, we may do so, in accordance with our regulatory requirements and having regard to;

(A) adequacy decisions;

(B) suitable Standard Contractual Clauses; and / or

(C) other valid transfer mechanisms.

4.4. If you want to receive more information about the safeguards applied to international transfers of personal data,

please use the contact details provided in Section 12 below.

5. DATA SECURITY

5.1. Marex has implemented appropriate technical and organisational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law and regulation.

5.2. You are responsible for ensuring that any Personal Data that you send to us is sent securely.

6. DATA ACCURACY

6.1. We take reasonable steps designed to ensure that:

(A) your Personal Data that we Process is accurate and, where necessary, kept up to date; and

(B) any of your Personal Data that we Process that is inaccurate (having regard to the purposes for which they are Processed) is erased or rectified without delay.

6.2. From time to time we may ask you to confirm the accuracy of your Personal Data.

7. DATA MINIMISATION

We take reasonable steps designed to ensure that Personal Data that we Process is limited to the Personal Data reasonably required in connection with the purposes set out in this Policy.

8. DATA RETENTION

8.1. Marex takes reasonable steps designed to ensure that your Personal Data is only Processed for the minimum period necessary for the purposes set out in this Policy. The criteria for determining the duration for which we will retain your Personal Data is as follows:

(A) we will retain copies of your Personal Data in a form that permits identification only for as long as:

(i) we maintain an ongoing relationship with you (for example, where you are a recipient of our services, or you are lawfully included in our mailing list and have not unsubscribed); or

(ii) your Personal Data is necessary in connection with the lawful purposes set out in this Policy, for which we have a valid legal basis (for example, where your Personal Data is included in a contract between you and Marex, and we have a legitimate interest in processing those data for the purposes of operating our business and fulfilling our obligations under that contract; or where we have a legal or regulatory obligation to retain your Personal Data); and

(B) for the duration of:

(i) any applicable limitation period under applicable law or regulation (for example, any period during which any person could bring a legal claim against Marex in connection with your Personal Data, or to which your Personal Data may be relevant); and

(ii) an additional three (3) month period following the end of such applicable limitation period (so that, if a person brings a claim at the end of the limitation period, we are still afforded a reasonable amount of time in which to identify any Personal Data that are relevant to that claim); and

(C) if any relevant legal claims or regulatory investigations are applicable to your Personal Data, Marex may continue to Process your Personal Data for such additional periods as are necessary in connection with such claim or investigation.

8.2. During the periods noted in paragraphs (B)(i) and (B)(ii) above, Marex will restrict its Processing of your Personal Data to storage of, and maintaining the security of the data, except to the extent that the data needs to be reviewed in connection with any legal claim, or any obligation under applicable law or regulation.

8.3. Once the periods in paragraphs (A) - (C) above, each to the extent applicable, have concluded, we will either:

(A) permanently delete or destroy the relevant Personal Data;

(B) archive your Personal Data so that it is beyond use; or

(C) anonymise the relevant Personal Data.

9. YOUR LEGAL RIGHTS

9.1. Subject to applicable law, you have a number of rights regarding the Processing of your Personal Data, including:

(A) the right to request access to, or copies of, your Personal Data that we Process or control, together with information regarding the nature, processing and disclosure of those Personal Data;

(B) the right to request rectification of any inaccuracies in your Personal Data that we Process or control;

(C) the right to request, on legitimate grounds:

(i) erasure of your Personal Data that we Process or control;

(ii) restriction of Processing of your Personal Data that we Process or control; or

(iii) receive your Personal Data in a structured, commonly used and machine-readable format (portability).

(D) the right to have your Personal Data that we Process or control transferred to another Controller, to the extent applicable;

(E) where we Process your Personal Data with your consent, the right to withdraw that consent;

(F) the right to lodge complaints with the Commissioner regarding the Processing of your Personal Data by us or on our behalf.

(G) the right to not be discriminated against on the basis that you have exercised any of the rights set out above.

9.2. This Policy does not affect your statutory rights.

9.3. Subject to applicable law, you may also have the following additional rights regarding the Processing of your Personal Data:

(A) the right to object, on grounds relating to your particular situation, to the Processing of your Personal Data by us or on our behalf; and

(B) the right to object to the Processing of your Personal Data by us or on our behalf for direct marketing purposes.

9.4. To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Policy, or our Processing of your Personal Data, please use the contact details provided in Section 12 below.

10. COOKIES

A cookie is a small file that is placed on your device when you visit a website (including our Sites) which records information about your device, your browser and, in some cases, your preferences and browsing habits. Marex may Process your Personal Data through cookie technology, in accordance with our Cookie Policy.

11. DIRECT MARKETING

11.1. We may Process your Personal Data to contact you, primarily by mail and email and on occasion by telephone, so that we can provide you with information concerning products and services that may be of interest, provided that we have first obtained your consent, to the extent required by, and in accordance with, applicable law and regulation.

11.2. If you do not wish to receive marketing communications from us you can opt out at any time by contacting your Marex Account Executive. After you unsubscribe, we will not send you further promotional emails, but we may continue to contact you to the extent necessary for the purposes of any services you have requested.

12. CONTACT DETAILS

12.1 For the purpose of this Policy, the Data Protection Officer can be contacted using the following link DataProtectionOffice@marex.com.

If you have any comments, questions or concerns about any of the information in this Policy, or any other issues relating to the Processing of Personal Data by Marex, please contact your regular Account Executive.

12.2 For the purposes of our adherence to GDPR and/or the DIFC Data Protection Law, we have updated and implemented various additional policies and guidelines which are connected to this policy.

13. DEFINED TERMS

"Company Data"	Any type of information created, received, or transmitted in the transaction of Company business, including Personal Data, regardless of physical format.
"**Controller**"	The entity that decides how and why Personal Data is Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
"Customers" or "Clients"	Parties with whom the Group enters into contractual arrangements, whether as a provider or recipient of products or services.
"Data Breach"	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Company Data or the physical, technical, administrative or organisational safeguards that we or our third-party service providers put in place to protect Company Data.
"Data Protection Officer"	a data protection officer appointed by a Controller, or Processor to independently oversee relevant data protection operations.
"Commissioner"	the person appointed by the DIFC in accordance with the DIFC Data Protection Law.
"Data Subject"	A living, identified or identifiable individual about whom we hold Personal Data.
"**Personnel**"	All current, former and prospective directors, officers, consultants, employees, temporary staff, individual contractors, interns, secondees and other personnel.
"**Personal Data**"	Information in any format from which a Data Subject can be (directly or indirectly) identified. Personal Data includes both factual Information and statement of opinion relating to a Data Subject.
"**Process**", "**Processed**" or "**Processing**"	Any activity that involves the use of Personal Data whether or not by automated means. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including consulting, organising, amending, retrieving, using, disclosing, aligning or combining, erasing or destroying it. Processing also includes transmitting or transferring Personal Data to third parties.
"**Processor**"	Any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).
"Sensitive Personal Data"	Personal Data revealing or concerning (directly or indirectly) racial or ethnic origin, communal origin, political affiliations or opinions, religious or philosophical beliefs, criminal record, trade-union membership and health or sex life and including genetic data and biometric data where it is used for the purpose of uniquely identifying a natural person, or any other information that may be deemed to be sensitive under applicable law or regulation.