



OCS INTERNATIONAL FINANCE LTD
EXPERIENCE LEADS TO SUCCESS

**DATA PROTECTION
PRIVACY NOTICE
WEBSITE PRIVACY POLICY**

PART I – DATA PROTECTION

1 Data Protection

- 1.1 The DIFC Data Protection Law ("**DPL**") regulates the collection, handling, disclosure and use of personal data in the DIFC, the rights of individuals to whom the personal data relates and the powers of the DIFC Authority in performing its duties in respect of matters related to the processing of personal data.
- 1.2 The DPL provides certain rights and protections in relation to the personal data that OCS holds. In order to comply with its obligations, OCS must ensure that personal data is:
 - (a) Processed fairly, lawfully and securely;
 - (b) Processed for specified, explicit and legitimate purposes in accordance with an individual's rights and not further processed in a way incompatible with those purposes or rights;
 - (c) Adequate, relevant and not excessive in relation to the purposes for which it is collected and/or further processed;
 - (d) Accurate, and where necessary, kept up to date; and
 - (e) Maintained in a form that permits identification of individuals for no longer than necessary for the purposes for which the personal data was collected and for which they are further processed.
- 1.3 OCS is required to take every reasonable step to ensure that personal data that is inaccurate or incomplete, having regard to the purpose for which it was collected or for which it is further processed, is erased, or rectified.
- 1.4 Persons about whom OCS holds personal data have the right to request:
 - (a) Confirmation as to whether the personal data relating to them is being processed, information on the nature and purposes of processing, the categories of personal data concerned and the recipient or categories of recipients to whom the personal data has been disclosed;
 - (b) A copy of the personal data undergoing processing (in an intelligible form) and any available information as to its source; and
 - (c) As appropriate, the rectification, erasure or blocking of personal data the processing of which does not comply with the provisions of the DPL.
- 1.5 All such requests should be directed to privacy@ocs-finance.net.

PART II – CLIENT PRIVACY

2 Client Privacy

2.1 What is Client Privacy?

Most countries have data protection laws that protect the privacy of individuals by regulating the way in which businesses handle personal information. Among other things, data protection laws require businesses that handle personal information to be open and transparent about why and how they handle personal information.

2.2 What is the purpose of this Privacy Policy?

The purpose of this Privacy Policy is to provide individuals with further detail on why and how OCS handles personal information in connection with the services OCS provides in the DIFC.

2.3 To whom does this Privacy Policy apply?

This Privacy Policy will apply in the following circumstances:

(a) Clients: Individuals and legal entities (or their employees) who directly receive services from OCS.

(b) Other Relevant Individuals

Individuals who interact with OCS in connection with the services OCS provides. Depending on the circumstances, such individuals can include, without limitation, the following:

(i) Individuals who work for other entities that interact with OCS in connection with the services OCS provides;

(ii) Individuals who work for entities that provide goods and/or services to OCS;

(iii) Individuals who have no business relationship with OCS but register on our website to receive email updates and alerts from OCS.

3 Personal Information

3.1 Who is responsible for the proper handling of personal information?

- OCS is legally responsible for the proper handling of personal information in the DIFC.

3.2 What sort of personal information does OCS collect?

- The types of personal information which OCS collects will vary significantly depending on numerous factors, including the individual's personal circumstances, the nature of their relationship with us, and the nature of the services OCS are asked to perform.

3.3 The personal information OCS obtains can be grouped into the following categories:

- (a) Contact Details: Contact details such as name, address, email, phone number.

- (b) Know Your Client ("KYC") Records: Information about an individual which OCS are obliged to check for legal or regulatory reasons, such as date of birth, country of residence, nationality, tax status, and other like information concerning identity and background (which may include, where applicable, sensitive information such as any criminal record and any sanction or embargo enacted against an individual).
- (c) Service Records: Information which we obtain in order to provide services to our Clients. Depending on the circumstances and the nature of the relationship with OCS, such information may include, assets and liabilities, investments we manage on behalf of our Clients, any business dealings with our Clients, actions we take towards an individual based on instructions we receive from our Clients, and information about an individual's personal circumstances.
- (d) Other Records: Other information which we may obtain as part of our day-to-day business operations, including but not limited to, an individual's attendance at conferences, seminars, and other events hosted or sponsored by OCS, and an individual's preference with respect to marketing communication sent by OCS.

3.4 OCS will collect personal information only where we are legally permitted to do so, and only to the extent it is appropriate and necessary for one or more of the purposes described in this notice.

3.5 Why does OCS collect personal information?

OCS handles personal information for one or more of the following purposes:

- (a) Service Delivery: To facilitate the provision of our services. Further information about the services we provide are available on our website at: www.ocs-finance.net
- (b) Service Development: To improve our services and devise new services.
- (c) Service Marketing: To promote the services we offer, and any related services offered by OCS.
- (d) Client Relationship Management: To manage, maintain, and develop our relationship with Clients.
- (e) Business Administration: To facilitate the effective management and administration of our business, including in relation to matters such as business planning, budgeting, and forecasting, as well as enforcement of our terms and conditions of service and collection of our fees.
- (f) Legal and Regulatory Compliance: To ensure that OCS (and our Clients) comply with all relevant legal and regulatory requirements, including, without limitation, legal requirements relating to money laundering, bribery and corruption, tax evasion, sanctions, etc.

Important Note: OCS may use personal information to perform various checks to ensure that we comply with all applicable legal and regulatory requirements before we formally accept a client and from time-to-time thereafter.

3.6 How does OCS obtain personal information?

OCS will endeavour to collect personal information directly from an individual wherever possible. However, the nature of the services we provide and the context in which we handle personal information can often result in OCS collecting personal information indirectly from third party sources. Additionally, there may be circumstances where we are required to seek personal information from independent sources (for example where we need to use personal information to comply with legal requirements to validate identity i.e. KYC).

3.7 From which sources does OCS obtain personal information?

- (a) Those who have referred individuals to us, such as their business contact, or another entity or undertaking within OCS.
- (b) An individual's spouse, partner, or parent who is our Private Client.
- (c) An individual's lawyer, accountant, tax advisor, wealth manager, and other such advisors who provide personal information to us on an individual's behalf.
- (d) Publicly accessible websites, registers, and databases, including official registers of companies and businesses, database of journals and news articles, and social media such as LinkedIn.
- (e) Providers of background check and business risk screening services, such as credit reference agencies, operators of fraud and financial crime databases, and operators of sanctions or embargoes databases (in some cases they can include authorities such as government departments and the police).
- (f) The relevant Private/Corporate Client to whom OCS provides the service and who entrusts us with an individual's personal information. Depending on the context, this could be, for example, the business which is owned or controlled by an individual, the business for which they work, or the investment entity which is supported by us.
- (g) Lawyers, accountants, actuaries, tax advisors, investment managers, risk managers, and other like professionals retained by the relevant Private/Corporate Client.
- (h) Distributors who market the investments which we manage on behalf of the relevant Private/Corporate Client.

3.8 Does OCS use personal information for marketing purposes?

OCS may from time to time use personal information to promote the services we offer, and other related services offered by OCS. However, we will do so only if an individual is someone who has:

- (a) Done business with OCS as a Private Client, a Client Business Contact, or by being involved in transactions which also involved us or another entity or undertaking within OCS;
- (b) Indicated an interest in the services we offer, or the related services offered by OCS, for example by registering on our website to receive email updates and alerts from us, or exchanging business cards with us at a conference, event, or a business meeting; or

(c) Never done any business with us but whom we have identified (based on business-related information such as their position and title, the company they work for, etc.) as potentially having an interest in the business-related service offered by OCS.

3.9 Where OCS contacts an individual for such purpose, we will typically contact them by email or postal mail (including via third-party marketing service providers acting on our behalf) but where the situation warrants, we may contact an individual by telephone. OCS will always observe the applicable direct marketing rules when contacting an individual and we will always respect an individual's marketing preferences.

3.10 If an individual wish to stop receiving promotional emails and updates from OCS, they can make use of the 'unsubscribe', 'opt out', or 'update their marketing preference' link we include within our promotional emails and updates. If for whatever reason such links are not functioning or missing, or if an individual feel that we have otherwise failed to respect their marketing preference, they should contact the OCS Data Protection Officer.

3.11 Does OCS share personal information with others?

OCS will share information with others only if and to the extent it is appropriate and necessary to do so for one or more of the purposes outlined in this document. Whenever we share personal information, whether internally or externally, OCS will ensure that such sharing is kept to the minimum necessary.

The extent to which we share personal information will vary depending on an individual's circumstances and relationship with us, however, personal information will only be shared with one or more of the following categories of recipients:

(a) Our Corporate Clients (if an individual is a Client Business Contact this could be their employer, and if they are a Service Beneficiary this could, for example, be the company which they serve in their capacity as a director, or the investment in which they have invested and which is managed by us).

(b) Companies, trusts, and partnerships that belong to OCS, including those who perform any of the support roles described in paragraph (c) and/or (d), as well as those who provide ancillary services as described in paragraph (e).

(c) Those who support our business operation, for example data centre operators, IT service providers, administrative support service providers, insurers, accountants, consultants, auditors, etc.

(d) Providers of background check and business risk screening services, such as credit reference agencies, operators of fraud and financial crime databases, and operators of sanctions and embargoes databases. Generally speaking, personal information will be shared with recipients who fall into this category only if the individual is a Private Client, a Business Owner, or a Service Beneficiary (where we are required to do so as part of the services we provide to our Corporate Clients).

(e) Exchanges, venues, distributors, brokers, depositaries, registrars, custodians, investment managers, platform operators, and other such third parties with whom we must by necessity interact in order to provide or facilitate the provision of our services. Depending on the context, such third parties can include those who provide services or facilities which complement the services we provide, for example legal advisors, brokers, corporate service providers, etc. as well as third parties who

participate in or contribute to transactions and arrangements in which our clients become involved, for example counterparties in corporate finance transactions involving our clients, and their advisors.

- (f) Government departments and agencies, police, regulators, courts, tribunals, and other like authorities with whom we are legally obliged to share personal information, or with whom we decide to cooperate voluntarily (but only to the extent we are legally permitted to do so).

Important Note: Where we share personal information with the authorities, we may, depending on the circumstances, be forbidden from advising the individual of the fact that their personal information was disclosed to or requested by the authorities, for example when doing so is illegal or might prejudice an on-going investigation.

3.12 Does OCS transfer personal information outside the DIFC?

Due to the international nature of the OCS's business operation and the markets in which we operate, personal information may be transferred outside the DIFC to any of the different categories of recipients described in this document, who could be located anywhere in the world.

3.13 Where we share personal information with recipients who are located outside the DIFC, we will take appropriate steps to ensure that such overseas transfer of personal information takes place in accordance with any legal restriction that applies to cross-border transfer of personal information in accordance with the DPL. Additionally, if we agree to restrict the cross-border transfer of personal information in any particular way with the relevant Private/Corporate Client, we will comply with such restriction.

3.14 Will personal information be kept secure by OCS?

OCS take information security very seriously and we use a broad range of tools and techniques to prevent and detect incidents that might adversely affect information we hold, such as unauthorised access or disclosure, and accidental change or loss, whether they are caused by external factors or internal factors.

The tools and techniques we use include technical measures such as firewalls, backup and disaster recovery systems, anti-malware, and encryption, as well as other measures such as vetting of suppliers who are entrusted with our information, awareness training for our Employees and the continuous evaluation and enhancement of our information security controls. We also conduct a broad range of monitoring over our IT and communication systems.

3.15 What would OCS do if a data breach occurs?

In the unlikely and unfortunate event that personal information under our control becomes compromised due to a breach of our security, we will act promptly to identify the cause and take the necessary steps to contain and mitigate the consequences of the breach. Where appropriate, we will also notify individuals of the breach in accordance with the DPL, and any other applicable law which requires us to notify individuals of the breach.

3.16 How long will OCS retain personal information?

The personal information which we collect will typically be retained at least for as long as the personal information continues to be relevant to the services we provide. For example, where we obtain personal information in connection with the provision of investment services because

an individual is a director of our Corporate Client, we will retain that personal information at least for as long as they remain a member of the board of directors of that Corporate Client.

Once personal information ceases to be relevant to the services we provide, in the context of the services we provide, this could happen, for example, when an individual ceases to be our Private Client, or when our Corporate Client decides to liquidate a particular entity we support, or when an individual exits from an investment we manage on behalf of our Corporate Client. We will retain personal information as part of our business records for the duration of the applicable retention period which will be determined by reference to any legal or regulatory record keeping requirement that applies to us.

For example, if personal information forms part of our client due diligence records which we retain for our own compliance purposes (or on behalf of our Corporate Clients for their compliance purposes) in accordance with the record keeping requirements of the Anti-Money Laundering, Counter-Terrorist Financing and Sanctions (AML) Module of the Dubai Financial Services Authority's Rulebook, we will typically be required to retain it for at least 6 years after the personal information ceases to be relevant to the services we provide.

In the absence of any specific legal or regulatory record keeping requirement which applies, we may retain personal information for an appropriate period where we consider this to be necessary to protect ourselves from any legal claim or dispute that may arise in connection with the relevant services we have provided. Where we do so, the retention period applied to personal information will reflect the relevant limitation periods.

3.17 Will this Privacy Policy change in the future?

We may revise this Privacy Policy from time to time to reflect changes in law or changes in how we run our business, but where such revision becomes necessary in the future, we will announce the changes on our website at www.ocs-finance.net/privacy and bring them to individual's attention to the extent it is practicable to do so.

3.18 What rights does an individual have in respect of their personal information?

In accordance with the DPL, individuals have certain legal rights in respect of their personal information handled by OCS. These include the following:

- (a) The right to withdraw consent where we rely on consent to justify the handling of personal information.
- (b) The right to ask us to confirm whether or not we handle any personal information about an individual.
- (c) The right to ask us to provide copies of personal information we hold.
- (d) The right to ask us to provide soft copies of personal information that has been provided to us (or to forward them to any other specified person).
- (e) The right to ask us to correct any inaccuracy or incompleteness in the personal information we hold.
- (f) The right to ask us to delete personal information we hold.

- (g) The right to ask us to refrain from handling personal information where an individual feel that the handling of personal information by us is unwarranted, for example due to inaccuracies in personal information or lack of proper legal justification.
- (h) The right to object to how we handle personal information, for example by asking us not to use personal information to profile an individual or to subject that individual to automated decision-making. An individual can also object to us using personal information for direct marketing purposes.

Important Note: The rights an individual has in respect of personal information is not absolute and subject to a range of legal conditions and exemptions. If and to the extent a relevant legal condition or exemption applies, OCS reserve the right not to comply with an individual's request. Additionally, while the rights an individual has can often be exercised free of charge, the law allows us to charge an individual in certain limited circumstances. In such cases, we reserve the right to charge a fee for processing such requests.

3.19 Who can an individual contact about their personal information?

If an individual would like to exercise any of the rights they have in respect of their personal information, or if an individual has any question or concern regarding the way in which we handle personal information, then they should contact the DPO in the first instance.

If an individual has a complaint regarding the way in which OCS handle personal information, they should contact the DPO in the first instance.

OCS will endeavour to respond satisfactorily to any request, query, or complaint an individual may have in respect of their personal information, but if an individual is dissatisfied with our response and wish to make a formal complaint, or if they simply wish to learn more about their rights, they can contact the Commissioner of Data Protection who enforces the DPL:

Commissioner of Data Protection
DIFC Authority Level 14, The Gate Building
Dubai International Financial Centre, PO Box 74777
Dubai, United Arab Emirates

Email: commissioner@dp.difc.ae

PART III – WEBSITE PRIVACY

4 Website Privacy

4.1 What is the OCS Website Privacy Policy?

At OCS International Finance Ltd (“OCS”), one of our main priorities is the privacy of our website visitors.

This Privacy Policy contains the types of information that is collected and recorded via the OCS website at www.ocs-finance.net and how we use it.

If you have additional questions or require further information about our Website Privacy Policy, please contact us at: privacy@ocs-finance.net.

5 Consent

By accessing this OCS website, you hereby consent to our Website Privacy Policy and agree to these terms and conditions.

6 Log Files

OCS follows a standard procedure of using log files. These files log visitor information when they visit a website. All internet hosting companies do this as a matter of standard practise as a part of hosting services’ analytics. The information collected by log files includes Internet Protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of pages visited. These log files are not linked to any information that is personally identifiable. The purpose of the information is for analyzing trends, administering the website, tracking users’ movement on the website, and gathering demographic information.

7 Cookies

Like any other website, OCS uses ‘cookies’. These cookies are used to store information including visitors’ preferences, and the pages on the website that the visitor accessed. The information is used to optimize the users’ experience by customizing our website content based on visitors’ browser type and/or other information.

8 Privacy Policies

Third-party advertising servers or ‘ad networks’ use technologies like cookies, JavaScript, or web beacons in their advertisements. These ad networks automatically receive your IP address when this occurs. These technologies are used to measure the effectiveness of their advertising campaigns and/or to personalize the advertising content that you see on websites. Please note that OCS has no access to or control over these technologies that are used by third-party advertisers.

9 Third-Party Privacy Policies

The OCS Website Privacy Policy does not apply to other advertisers or websites. Thus, we are advising you to consult the respective Privacy Policies of these third-party ad servers for more detailed information. It may include their practices and instructions about how to opt out of certain functions, for example, you can choose to disable cookies through your browser options.

For more detailed information about cookie management with specific web browsers, please refer to the browsers' respective websites.

10 Online Privacy Policy Only

This Website Privacy Policy applies only to our online activities and is valid for visitors to our website with regards to the information that they share and/or collect. This policy is not applicable to any information collected offline or via channels other than this website.