

PRIVACY POLICY

This privacy policy (this "**Policy**") informs you ("**you**") as user of our Portal how AI Rostamani International Exchange LLC ("**ARIE**", "**We**") collects, processes uses and discloses your personal information as a data controller, when you contact us, use our services or interact with our Portal including websites and mobile apps (together "**Portal**").

This Policy remains subject to further amendments from time to time at ARIE's discretion.

By using the Portal you agree to abide by the terms of this Policy otherwise please refrain from using the Portal and visit us at our office address to undertake your requirements.

WHAT THIS POLICY COVERS

We are committed to adopting the best practice when it comes to how we collect, use and protect your personal information, and have accordingly developed this Policy, which:

- Sets out the types of personal information we collect;
- Explains how and why we collect and use your personal information;
- Explains when and why we may share personal information within ARIE and with other organisations;
- Explains how we protect the personal information we collect; and
- Explains the rights and choices you have in relation to your personal information.

This Policy applies if you use our services (referred to in this Policy as "**Services**"). Using our Services means without limitation:

- 1. Demand draft services
- 2. Electronic Funds Transfer
- 3. Instant Money Transfer services
- 4. Cash Passport Reload
- 5. Utilities payments
- 6. WPS services

INFORMATION COLLECTED AT REGISTRATION AND ITS USAGE:

When you register to our Portal, you agree that we may collect:

- Your personal details, including your postal and billing addresses, email address(es), phone number(s), date of birth, gender, and passport or ID number;
- Your account login details, such as your username and the password (encrypted) that you have chosen; and
- Your interests, preferences, income, and other profiling information.

When you use our Portal, you agree that we may collect:

Information about your online Services;



- Information about your online browsing behavior on our Portal;
- Information about devices you have used to access our Portal and Services (including the make, model and operating system, IP address, browser type and mobile device identifiers); and
- Information about your precise geo location.

We may also use personal information from other sources, such as specialist companies that supply information, online media channels, our partners and public registers. We may collect the following types of personal information about you from other sources: contact details, credit history, purchases, interests, preferences, or other types of publicly available information. This other personal information helps us to:

- Review and improve the accuracy of the data we hold; and
- Improve and measure the effectiveness of our marketing communications, including online advertising.

We may be required by law to collect, retain and disclose personal information collected by ARIE (including, but not limited to, any personal information we hold as a consequence of any contractual relationship we have with you) as required by applicable laws.

Subject to the requirements under applicable laws, if you choose not to permit your personal information to be used in accordance with this Policy, you will still be able to visit our Portal but you may not be able to access certain options or Services, and in some cases we may not be able to fulfil a Service you request.

WHY AND HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information to provide the Services you have requested, including:

- Making our Services available to you;
- Checking and process any transaction you undertake on the Portal; and
- Managing the accounts you hold with us.

We may use your personal information to personalise the marketing messages we send to you and to make them more relevant and interesting. Where necessary we will obtain your consent first. We may use your personal information for this purpose in the following ways:

- Using your online browsing behaviour to help us better understand you as a customer and provide you with personalised offers and services;
- Providing you with relevant marketing communications (including by email, post, telephone, SMS, or online advertising), relating to Services we offer. As part of this, online advertising may be displayed on our Portal and on other organisations' websites and online media channels. We may also measure the effectiveness of our marketing communications;



• To help us to better understand you and provide you with services and marketing communications, that are relevant to your interests, we combine personal information we collect when you access our Portal.

We may use your personal information when we communicate with you, in order to:

- Contact you about our Services, for example by phone, email or post or by responding to social media posts that you have directed at us;
- Invite you to take part in and manage customer surveys, questionnaires and other market research activities carried out by ARIE and by other organizations on our behalf.

ANALYSING YOUR INFORMATION

We analyze information about how you use our Services to:

- Manage and improve our Portal;
- Understand any issues with our Services;
- To improve our Services; and
- Detect and prevent fraud or other crime.

SHARING PERSONAL INFORMATION

Subject to the requirements under applicable laws, we may share your personal information with third parties under the following circumstances:

- ARIE Subsidiaries

We may share the personal information collected by any of our subsidiaries with our other subsidiaries for the purposes listed above.

- ARIE employees

We may share your personal information with our employees.

- Service Providers

We may disclose your personal information to any third party involved in the process of provision of the Services.

We work with carefully selected Service Providers that carry out certain functions on our behalf. These include, for example, companies that help us with technology services, storing and combining data, processing payments and delivering the Services.



Third Parties

Subject to the requirements under applicable laws, we may share personal information with other organisations in the following circumstances:

- If any applicable law or a public authority says we must share the personal information;
- If we need to share personal information in order to establish, exercise or defend our legal rights (this includes providing personal information to others for the purposes of preventing fraud and reducing credit risk);
- To an organisation we sell or transfer (or enter into negotiations to sell or transfer) any of our businesses or any of our rights or obligations under any agreement we may have with you to. If the transfer or sale goes ahead, the organisation receiving your personal information can use your personal information in the same way as us;
- To any other successors in title to our business; or
- To anyone to whom we transfer or may transfer our rights and duties under our agreement(s) with you.

HOW WE PROTECT PERSONAL INFORMATION

We maintain physical, technical, and organisational safeguards to secure your personal information from unauthorized access, use, alteration and destruction. However, no internetbased site can be 100% secure and we cannot be held responsible for unauthorised or unintended access that is beyond our control.

SOCIAL MEDIA

We operate channels, pages and accounts on some social media sites to inform, assist and engage with customers. We monitor and record comments and posts made on these channels about us so that we can improve our Services.

ARIE is not responsible for any information posted on those sites other than information we have posted ourselves. We do not endorse the social media sites themselves or any information posted on them by third parties.

RETENTION

We keep records of any personal information provided by you, for as long as required to a) provide our Services b) personalise the Services and communications with you c) comply with the applicable record retention legal requirements. When deciding how long to keep your personal information after our relationship with you has ended, we take into account our legal obligations and regulators' expectations.

If you wish to request that we no longer use your information to provide you Services, contact us at <u>arieeservices@alrostamanigroup.ae</u>

However, we will retain and use your registration information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.



MARKETING COMMUNICATIONS

All marketing communications we send to you will provide you with a way to withdraw your consent to future marketing. If you no longer wish to receive promotional materials you may optout from receiving these communications or change your account settings, this will remove you from marketing lists.

Please note that if you unsubscribe from marketing communications you will still receive operational and service messages from us regarding the Services and responses to enquiries made to us, and that we may hold your details on a suppression list so we don't send you marketing communications in the future.

COOKIES AND SIMILAR TECHNOLOGIES

We use cookies and similar technologies, such as tags and pixels ("**Cookies**"), to personalise and improve your customer experience as you use our Portal and to provide you with relevant online advertising. Cookies are small data files that allow a website or Mobile App to collect and store a range of data on your desktop computer, laptop or mobile device.

Cookies help us to provide important features and functionality on our Websites and Mobile Apps, and we use them to improve your customer experience.

Cookies allow us to improve the way our Websites and Mobile Apps work so that we improve the performance of our Websites and Mobile Apps.

Cookies can help us to understand how our Websites and Mobile Apps are being used, for example, by telling us if you get an error messages as you browse. These Cookies collect data that is mostly aggregated and anonymous.

We use Cookies to help us deliver online advertising that we believe is most relevant to you on our Portal.

These Cookies may collect information about your online behaviour, such as your IP address, the website you arrived from.

Measuring the effectiveness of our marketing communications, including online advertising Cookies can tell us if you have seen a specific advert, and how long it has been since you have seen it. This information allows us to measure the effectiveness of our online advertising campaigns and control the number of times you are shown an advert.

We also use Cookies to measure the effectiveness of our marketing communications, for example by telling us if you have opened a marketing email that we have sent you.

YOUR CHOICES IN RELATION TO COOKIES



You can use your browser settings to accept or reject new Cookies and to delete existing Cookies. You can also set your browser to notify you each time new Cookies are placed on your computer or other device.

If you choose to disable some or all Cookies, you may not be able to make full use of our Portal.

Once you have given us your consent to the use of cookies, we shall store cookies on your computer or device. If you wish to withdraw your consent at any time, you will need to delete our cookies using your internet browser settings.

YOUR RIGHTS

You have the right to see or access the personal information we hold about you. To receive a copy, please write to <u>arieeservices@alrostamanigroup.ae</u>

In addition, you have certain rights regarding your personal information, subject to the requirements under applicable laws. These include the following rights to:

- Rectify the personal information we hold about you;
- Erase your personal information;
- Restrict our use of your personal information unless otherwise required by the applicable laws and regulations;
- Object to our use of your personal information;
- Withdraw any consents you have provided for our use of your personal information;
- Receive your personal information in a usable electronic format and transmit it to a third party (right to data portability); and
- Lodge a complaint with your local data protection authority.

If you would like to discuss or exercise such rights, please contact us at arieeservices@alrostamanigroup.ae.

If you are concerned that any of the personal information we hold about you is incorrect, or out of date, please write to the address above to report your concerns and we will take appropriate steps to amend our records.

Please note that we will likely require additional information from you in order to honour your requests.

LINKS TO OTHERS

Our Websites or Mobile Apps may contain links to other websites operated by other organisations that have their own privacy policies. Please make sure you read the terms and conditions and privacy policy carefully before providing any personal information on a website as we do not accept any responsibility or liability for websites of other organisations.

LIMITATION ON LIABILITY



You agree that ARIE shall not be liable for any loss, charge, action or infringement (of whatsoever nature) caused as a result of:

- ARIE using your personal information in accordance with this Policy;
- Disclosure of your personal information to any third party (or their use of the same), in accordance with this Policy;
- Retention and/or disclosure of any personal information to any governmental or regulatory authority, as required under applicable laws; or
- The use of the Cookies.

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