



Amana Capital Limited

PRIVACY POLICY

January 2021

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1. Introduction

Amana Capital Ltd (hereinafter referred to as 'Amana', 'Company', 'we', 'our', 'us' as appropriate) is a Cypriot Investment Firm (hereinafter referred to as "CIF") registered with the Registrar of Companies in Cyprus under registration number HE 281953 and regulated by the Cyprus Securities and Exchange Commission (hereinafter referred to as "CySEC") under license number 155/11.

This policy sets out the different areas where user privacy is concerned and outlines the obligations & requirements of the users, the website and website owners. Furthermore, the way this website processes, stores and protects user data and information will also be detailed within this policy.

2. The website

The Company is registered with the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus for the purposes of personal data processing. Therefore, your personal data is kept and handled in accordance with the General Data Protection Regulation (EU) 2016/679, as adopted by national data protection authorities; and all necessary steps are taken to protect the privacy of our website's users throughout their visiting experience.

By accessing our websites, we consider that you have read and understood the terms of this policy and how we process any information you disclose to us including personal data prior to becoming a client, during our business relationship and after its termination.

3. Use of cookies

What are cookies

Cookies are small files saved by the browser to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website.

What do we use cookies for?

We may use cookies to remember personal settings you have chosen at our website. In no other context do we use cookies to collect information that identifies you personally. Most of the cookies we set are automatically deleted from your computer when you leave our website or shortly afterwards.

We use anonymous session cookies (short-term cookies that disappear when you close your browser) to help you navigate the website and make the most of the features. If you log into the website, application or a course as a registered user, your session cookie will also contain your user ID so that we can check which services you are allowed to access.

This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information.

Should users wish to deny the use and saving of cookies from this website onto their computer's hard drive, they should take necessary steps within their web browser's security settings to block all cookies from this website and its external serving vendors.

4. Personal information

Whilst using our website, software applications or services, you may be required to provide personal information (name, address, email, account details, etc.). We will use this information to administer our website, applications, client databases and marketing material. We will ensure that all personal information supplied is held securely in accordance with the General Data Protection Regulation (EU) 2016/679, as adopted into law of the Republic of Cyprus. Further, by providing telephone, address and email details, you consent to Amana Capital LTD contacting you using that method.

You have the right at any time to request a copy of the personal information we hold on you. Should you wish to receive a copy of this, or would like to be removed from our database, please contact us at supportcy@amanacapital.com.

5. Information collection and use

How do we collect information?

Amana Capital LTD collects information in two possible ways:

a. When you directly give it to us ("Directly Provided Data")

When you sign up for our site, purchase our products or communicate with us, you may choose to voluntarily give us certain information – for example, by filling in text boxes or completing registration forms. All this information requires a direct action by you at that time in order for us to receive it.

Collecting this information enables us to better understand the visitors who come to our website, where they come from, and what content on our website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our website to our visitors.

b. When you give us permission to obtain from other accounts ("User Authorised Data")

Depending on your settings or the privacy policies for other online services, you may give us permission to obtain information from your account with those other services. For example, this can be via social media or by choosing to send us your location data when accessing our website from your smartphone.

We use the information we receive from these third parties to enhance the services we provide to you, such as providing curated content that is relevant to the services we provide you with or topics you are interested in.

We will have the legitimate interest in contacting you by email, SMS, post or phone to ensure that you are aware of all the services available to you, or for other marketing purposes. However, you can opt out from these communications at any time, for more details refer to "section 11. Promotional and Newsletter Communication".

Where our use of your personal information does not fall under one of these Lawful bases, we require your consent. Such consent shall be freely given by you and you have the right to withdraw your consent at any time by contacting us using the contact details set out in this privacy notice.

6. Who may we disclose personal information to

We may disclose your personal information to the following categories of recipients:

- a. to our group companies, third party services providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our website), or who otherwise process personal information for purposes that are described in this Privacy Policy or notified to you when we collect your personal information.
- b. to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.
- c. to any other person with your consent to the disclosure.

7. Data Retention

Amana Capital LTD will not retain your personal information longer than necessary. We will hold onto the information you provide either while your account is in existence, or as needed to be able to provide the Services to you, or (in the case of any contact you may have with our Customer Services team) for as long as is necessary to provide support-related reporting and trend analysis only.

If legally required or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our Terms and Conditions, we may also retain some of your information for a limited period of time as required, even after you have closed your account or it is no longer needed to provide the Services to you.

8. How do we keep your personal information secure

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. In particular, we:

- a. Hold personal information in secure facilities and where the information is held electronically, on secure servers.
- b. Use encrypted transmission links whenever we can.
- c. Use other safeguards such as firewalls, authentication systems (e.g., passwords), and access control mechanisms to control unauthorised access to systems and data.

- d. Regularly review our information collection, storage and processing practices, including physical security measures, to guard against unauthorised access to systems.
- e. Restrict access to personal information to our employees, contractors and agents who need to know that information in order to process it for us and who are subject to strict contractual confidentiality obligations. Amana may discipline or terminate individuals who maliciously acquire information, without being entitled to its access.

9. International Data Transfers

Subject to certain conditions, we may transfer your personal information to a third party in countries outside the EEA for further processing in accordance with the purposes set out in this Privacy Policy. In these circumstances we will, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate technical, organisation, contractual or other lawful means. These include putting in place data transfer agreements for transfers of personal information between our group companies, which require all group companies to protect personal information they process from the EEA in accordance with European Union data protection law. We have implemented similar appropriate safeguards with our third-party service providers and partners and further details can be provided upon request.

10. Application forms

Amana Capital LTD will not sell your personally identifiable information, gathered as a result of filling out our account application form, to anyone.

Choosing how we use your data

We understand that you trust us with your personal information, and we are committed to ensuring you can manage the privacy and security of your personal information yourself.

With respect to the information relating to you that ends up in our possession, and recognising that it is your choice to provide us with your personally identifiable information, we commit to giving you the ability to do all of the following:

- You can verify the details you have submitted to Amana by contacting our Customer Services team at supportcy@amanacapital.com.
- Our security procedures mean that we may request proof of identity before we reveal information, including your e-mail address and possibly your address.
- You can also contact us by the same method to change, correct, or delete your personal information controlled by Amana regarding your profile at any time. Please note though that, if you have shared any information with others through social media channels, that information may remain visible, even if your account is deleted.
- You can always feel free to update us on your details at any point by contacting us at supportcy@amanacapital.com.
- You can request a readable copy of the personal data we hold on you at any time. To do this, please contact us at supportcy@amanacapital.com

11. Promotional and Newsletter Communication

If you prefer not to receive promotional information from us or other Amana affiliates, please let us know by using one of the following methods: (i) call us at +35725257999, or (ii) email us at supportcy@amanacapital.com. Please be sure to include your full name and the e-mail address you used when you registered with or made a purchase from us. It may take up to 2 weeks to process your postal mail request, during which period you may continue to receive communication from Amana or other affiliates. You may also unsubscribe from Amana Email services by following the opt-out instructions situated at the bottom of any promotional message you receive from Amana.

If you opt out, we may still send you non-promotional communications, such as security alerts and notices related to your access or use of Amana services or those about your online account or our ongoing business relations.

12. Changes to this privacy policy

We reserve the right to update this privacy policy at any time, and we will provide you with a new privacy policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

13. Contact us

If you have a concern about our handling of your personal information, please get in contact with us first so we can try to resolve your query by any of the following methods:

Post:

Data Protection Officer

Amana Capital Limited

12 Arch. Makariou III, Kristelina Tower, Office 302, Mesa Geitonia 4000

Limassol

Cyprus

Online:

dpo@amanacapital.com

Telephone:

+35725257999 – Ext: 121

If, however you feel we have not dealt with your concern and that we are failing to meet our legal obligations, you can report this to your local data protection regulator or the Commissioner for Personal Data Protection in Cyprus at: commissioner@dataprotection.gov.cy.