



MiTRADE

Trade Faster Trade Smarter

PRIVACY POLICY

MITRADE FINANCIAL SERVICES LLC

SEPTEMBER 2025

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RISK WARNING: RISK WARNING: OTC DERIVATIVES ARE A LEVERAGED PRODUCT AND CAN RESULT IN THE LOSS OF YOUR ENTIRE CAPITAL. TRADING OTC DERIVATIVES MAY NOT BE SUITABLE FOR EVERYONE. PLEASE CONSIDER THE PRODUCT SHEET, RISK DISCLOSURE STATEMENT AND CLIENT AGREEMENT BEFORE USING THE SERVICES AND ENSURE THAT YOU UNDERSTAND THE RISKS INVOLVED. YOU DO NOT OWN OR HAVE ANY INTEREST IN THE UNDERLYING ASSETS.

1. Introduction

Mitrade Financial Services LLC (“we,” “our,” “us”) is licensed by the Securities and Commodities Authority of the United Arab Emirates under a Category 5 license to act as an introducer and promoter of financial products and services offered by regulated third-party institutions.

The Company primarily promotes and introduces the products and services of Mitrade International Ltd, a Mauritius-based entity licensed by the Financial Services Commission (FSC) as an Investment Dealer (Full-Service Dealer, excluding Underwriting) under licence number GB20025791.

In line with applicable regulatory requirements, Mitrade Financial Services LLC is obliged to have access to records of the clients it has introduced to Mitrade International Ltd. Therefore, by accepting this Privacy Policy, you acknowledge and provide your consent to the processing of your personal data by Mitrade Financial Services LLC in accordance with the terms set out herein.

We are committed to protecting your privacy and processing your personal data lawfully, fairly, and transparently, in line with:

- UAE Federal Decree-Law No. 45 of 2021 on Personal Data Protection (PDPL);
- SCA Category 5 licensing requirements; and
- Applicable anti-money laundering (AML) and counter-terrorist financing (CTF) laws.

2. Scope

This Privacy Policy applies to all individuals who engage with Mitrade Financial Services LLC in the course of our business activities under our Category 5 license issued by the Securities and Commodities Authority (SCA). This includes prospective and existing clients to whom we provide introductions and promotional services, individuals whose personal data we collect in connection with seminars, training sessions, events, marketing initiatives, or general enquiries, as well as representatives of institutional clients, vendors, service providers, and other counterparties with whom we interact in the ordinary course of business. It also applies to visitors who access and use our website, online portals, and other digital platforms.

This Privacy Policy governs only the collection, use, and protection of personal data by Mitrade Financial Services LLC in its capacity as an introducer and promoter. It does not extend to, nor does it cover, the processing of personal data by third-party regulated financial institutions to which we may introduce you. Such third parties act as independent data controllers and are solely responsible for their own privacy and data protection practices, policies, and compliance with applicable laws. We strongly encourage you to review the privacy policies of those institutions to understand how they process your personal data.

Mitrade Financial Services LLC does not provide investment advice, portfolio management, order execution, custody, or dealing services. Our role is strictly limited to acting as an introducer and promoter of financial products and services offered by duly regulated third-party institutions.

3. What Personal Data We Collect

Mitrade Financial Services LLC will be granted access by Mitrade International Ltd. to the following personal data collected:

A. Identification Data

- Full name, nationality, date of birth
- Passport/ID or government-issued identification documents
- Contact details (address, phone number, email)

B. Compliance & Due Diligence Data

- KYC documentation (proof of identity, proof of address, utility bills, etc.)
- Tax residency information (FATCA/CRS)
- Politically Exposed Person (PEP) declarations
- AML/CTF screening results
- Source of funds / source of wealth (where required under AML regulations)

C. Referral & Interaction Data

- Records of meetings, calls, and correspondence with you
- Your expressed interest in specific financial products/services

D. Technical & Digital Data

- IP address
- Information about your computer and/or mobile device
- Operating system and browser type.

It must be mentioned that data listed in point D above is collected for system administration purposes and may also be used to provide aggregated, anonymised statistical data to our advertising partners.

4. Purpose of Processing

Your personal data is processed only for specific and lawful purposes, including:

1. **Introductions & Referrals**
 - To evaluate your suitability for introduction to a regulated third-party financial institution;

➤ To facilitate introductions and referrals by sharing your data with such institutions.

2. Regulatory Compliance

- To comply with SCA Category 5 licensing requirements;
- To comply with UAE AML/CTF laws, sanctions screening, and regulatory reporting obligations;
- To maintain accurate records as required by UAE authorities.

3. Business Operations

- To manage our relationship with you as an introducer/promoter;
- To maintain internal records and audit trails;
- To respond to your enquiries and provide you with requested information.

4. Marketing (Consent-Based)

- To send you information about financial products and services that we are licensed to promote;
- To invite you to events, webinars, or marketing activities (where consented).

5. Legal Basis for Processing

Mitrade Financial Services LLC processes personal data strictly in accordance with the requirements of the UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (PDPL) and other applicable laws and regulations.

The lawful bases on which we rely include:

- Contractual Necessity** – we process personal data where it is necessary to establish, perform, or administer the introductions and related services that you request from us, including facilitating communication with third-party regulated financial institutions;
- Compliance with Legal Obligations** – we are required to process and retain certain personal data in order to comply with obligations under the SCA regulatory framework, anti-money laundering and counter-terrorist financing (AML/CTF) legislation, tax reporting regimes (such as FATCA/CRS), and other statutory requirements imposed by UAE law and competent authorities;
- Legitimate Interests** – we may process personal data where it is necessary to pursue our legitimate business interests, provided such interests are not overridden by your fundamental rights and freedoms. These interests include maintaining accurate business and regulatory records, enhancing the quality and security of our services, conducting risk management, and ensuring regulatory readiness; and
- Consent** – in limited circumstances, we may rely on your explicit consent, particularly in relation to non-essential processing activities such as sending you marketing communications, providing information on events, or disclosing data beyond what is strictly required by law or contract. Where processing is based on consent, you retain the right to withdraw your consent at any time, without affecting the lawfulness of processing carried out prior to withdrawal.

6. Data Sharing

Mitrade Financial Services LLC may share your personal data with carefully selected third parties where this is necessary and lawful. Such recipients may include regulatory and supervisory authorities, such as the Securities and Commodities Authority (SCA), the UAE Central Bank, the UAE Financial Intelligence Unit, and law enforcement agencies, where disclosure is required in order to comply with applicable laws and regulatory obligations.

In addition, we may engage third-party service providers to support the operation of our business, including providers of KYC/AML screening tools, IT infrastructure and hosting services, and marketing or administrative support. These service providers are contractually bound by strict confidentiality and data protection obligations and may only process your personal data in accordance with our instructions and for the purposes specified. Mitrade Financial Services LLC does not, under any circumstances, sell, rent, or trade your personal data to any third party.

7. International Data Transfers

Where our partner financial institutions, group entities, or third-party service providers are located outside the United Arab Emirates, your personal data may be transferred to and processed in jurisdictions that may not have the same data protection standards as those applicable within the UAE. In such circumstances, Mitrade Financial Services LLC takes all necessary steps to ensure that your personal data continues to receive an adequate level of protection.

Specifically, we will only transfer data to countries that have been deemed to provide an adequate level of protection under the UAE Federal Decree-Law No. 45 of 2021 on Personal Data Protection (PDPL), or, where such adequacy has not been formally recognised, we will implement appropriate contractual, technical, and organisational safeguards to ensure confidentiality, integrity, and lawful processing of your personal data. These safeguards may include the use of standard contractual clauses, data processing agreements, or other binding instruments that impose obligations consistent with the PDPL. We also ensure that any such transfers are strictly limited to what is necessary for the purposes described in this Privacy Policy, and that data subjects continue to benefit from enforceable rights and effective legal remedies.

8. Data Retention

Mitrade Financial Services LLC retains personal data only for as long as necessary to fulfil the purposes for which it was collected, in accordance with applicable legal, regulatory, and business requirements. In particular, and as required under the Securities

and Commodities Authority (SCA) rules, the UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (PDPL), and Federal Decree-Law No. 20 of 2018 on Anti-Money Laundering and Counter-Terrorist Financing, we are obliged to retain client records, identification data, and transaction-related information for a minimum period of five (5) years following the termination of the business relationship or the date of introduction, unless a longer period is mandated by law or regulatory guidance.

In addition to the above, the Company maintains complete and accurate records relating to introductions, marketing activities, and regulatory matters for a minimum period of five (5) years, or for a longer period where required under applicable laws or regulatory obligations. Records may include client referral documentation, marketing communications, compliance reviews, approvals, correspondence with regulators, and supporting evidence.

Personal data may also be retained beyond this minimum period where necessary to comply with ongoing legal proceedings, investigations, enforcement actions, or to establish, exercise, or defend legal claims. At the end of the applicable retention period, we ensure that personal data is securely and irreversibly destroyed or anonymised, using appropriate technical and organisational measures designed to prevent unauthorised access, disclosure, or misuse. Our retention practices are subject to periodic review to ensure compliance with the principles of data minimisation and storage limitation under the PDPL.

9. Your Rights

In accordance with the provisions of the UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (PDPL), you are entitled to exercise certain rights in relation to the personal data processed by Mittrade Financial Services LLC. These rights include the right to request confirmation as to whether we hold personal data concerning you and to obtain access to such data in a clear and intelligible form. You have the right to request the rectification or updating of any personal data that is inaccurate, incomplete, or outdated. In certain circumstances, you may request the erasure of your personal data; however, this right is subject to restrictions where retention is required under applicable anti-money laundering (AML), counter-terrorist financing (CTF), tax, or regulatory record-keeping obligations. You also have the right to request that the processing of your personal data be restricted, or to object to specific forms of processing, including the use of your data for direct marketing purposes.

Where processing is based on your consent, you may withdraw such consent at any time without affecting the lawfulness of processing carried out prior to withdrawal. In addition, you may, where technically feasible and applicable, request the transfer of your personal data to yourself or to another data controller (data portability). All rights are exercised subject to applicable legal and regulatory limitations, and we will respond to such requests in accordance with the provisions of UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data PDPL.

10. Data Security and Breach Notification

Mittrade Financial Services LLC is committed to ensuring the confidentiality, integrity, and availability of the personal data it processes. To achieve this, we implement a comprehensive framework of technical and organisational security measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access. These measures include the use of secure encryption protocols for both the storage and transmission of data, thereby ensuring that information is protected while at rest and in transit. Access to personal data is strictly controlled through role-based permissions, multi-factor authentication, and other access management procedures, ensuring that only authorised personnel with a legitimate business need can view or process such information.

Our systems and controls are subject to regular monitoring, internal audits, penetration testing, and periodic reviews to identify and address potential vulnerabilities. In addition, we maintain robust business continuity and disaster recovery protocols to ensure that critical data and services remain available in the event of a system outage, cyber incident, or other disruption.

All staff handling personal data receive training on data protection obligations and are bound by strict confidentiality undertakings. These measures are reviewed and updated on an ongoing basis to remain aligned with evolving industry standards, regulatory requirements, and emerging cybersecurity threats.

In the unlikely event of a personal data breach that may result in a risk to the rights and freedoms of individuals, Mittrade Financial Services LLC will comply with its obligations under the UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (PDPL). This includes promptly notifying the UAE Data Office and/or other competent authorities, as well as informing affected data subjects without undue delay where the breach is likely to result in a high risk to their personal rights or interests. Notifications will include a description of the nature of the breach, the categories of data affected, the potential consequences, and the measures taken or proposed to mitigate any adverse impact.

11. Cookies and Marketing

Our services are not designed or intended for use by individuals under the age of majority (minors). We do not knowingly collect, process, or maintain personal data relating to children. Clients and counterparties are requested not to provide any personal information concerning minors when engaging with the services. If we become aware that children's data has been inadvertently collected, we will take immediate steps to delete or anonymise such information in line with applicable data protection laws and our internal procedures.

Our website may use cookies and similar tracking technologies to enhance user experience and improve the delivery of our services. Cookies are small text files placed on your device that allow us to recognise your browser, store certain preferences, and collect information about how you interact with our website. We use cookies for several purposes, including to improve the performance and functionality of the website, to analyse traffic patterns and usage trends in order to optimise content and navigation, and to measure the effectiveness of our digital communications. Where you have provided your consent, cookies and similar technologies may also be used for marketing purposes, such as delivering targeted content, tailoring promotional messages to your interests, and measuring the effectiveness of campaigns. Some cookies are "essential" for the operation of our

website, while others are “non-essential” and require your consent before being placed on your device. You may manage or disable cookies at any time by adjusting your browser settings; however, please note that disabling certain cookies may affect the functionality or performance of our website. In line with the UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (PDPL), we ensure that any personal data collected through cookies or tracking technologies is processed lawfully, transparently, and solely for the purposes outlined in this Privacy Policy.

Types of Cookies We Use

1. **Strictly Necessary Cookies** – These cookies are essential for the basic functioning of our website and enable you to navigate and use its features. They cannot be switched off in our systems and do not require your consent. Examples include cookies used to manage security, authentication, and session management.
2. **Performance and Analytics Cookies** – These cookies collect information about how visitors use our website, such as which pages are visited most often, how users move around the site, and whether error messages are displayed. The information gathered is aggregated and used solely to improve the functionality and performance of the website.
3. **Functionality Cookies** – These cookies allow our website to remember your preferences (such as language or region) and provide enhanced, more personalised features. They may also be used to enable certain optional features of the website.
4. **Targeting and Marketing Cookies** – With your consent, these cookies may be placed to track your browsing habits and deliver advertising or promotional content relevant to your interests. They are also used to limit the number of times you see an advertisement and to measure the effectiveness of marketing campaigns.
5. **Third-Party Cookies** – In some cases, we may allow trusted third-party service providers (such as analytics or advertising networks) to place cookies on your device. These cookies are subject to the respective third parties’ privacy and cookie policies, and we encourage you to review them.

12. Contact Us

If you have any questions regarding this Policy, wish to access or change your information or have a complaint, or if you have any questions about security on our Website and/or Mobile Applications, you may email us at cs.uae@mitrade.com

13. Policy Updates

Mitrade Financial Services LLC may amend this Privacy Policy from time to time in order to reflect changes in applicable laws and regulations, guidance issued by the UAE Data Office or the Securities and Commodities Authority (SCA), or adjustments to our internal practices, business operations, or technological developments. Any modifications will be effective once published, and the most recent version of the Privacy Policy will always be available on our official website. Where material changes are introduced such as new purposes for processing, expanded data sharing, or changes in your rights we will take appropriate steps to notify you, which may include direct communication by email, written notice, or a prominent announcement on our website, prior to the changes taking effect. We encourage you to review this Privacy Policy periodically to remain informed about how we protect and process your personal data. Continued use of our services after such updates will constitute acknowledgment and acceptance of the revised terms.

If you have any questions regarding the content, scope, or application of this Policy, or if you wish to obtain further information about how your personal data is collected, used, stored, or otherwise processed, you may contact us at cs.uae@mitrade.com. Our Compliance teams will review your inquiry and provide an appropriate response or guidance in accordance with applicable data protection and regulatory requirements within 30 days.





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