### Privacy Policy

Effective Date: 25 Jan 2025

This Privacy Policy outlines how EQUITYOWN TECH LLC FZ (registered at Meydan Free Zone, Dubai, UAE) (collectively referred to as "Company," "we," or "us") collect, use, disclose, and safeguard personal and non-personal information of users who access or interact with our Websitew www.equityown.com and Application EQUITYOWN (hereinafter referred to as "Platform"). At any time, the user can, at his/her discretion, allow or forbid the collection and use of his/her personal information. Our legal basis for the collection of user data is the applicable privacy laws of the territory and applicable international privacy laws. By using our Platform, you agree to the practices described in this Privacy Policy. If you do not agree, you must refrain from using our Platform.

### 1. Information We Collect

We are committed to ensuring that any data we collect is relevant, and secure. The types of information we collect include:

### a. Personal Information

Personal information refers to data that can identify you as an individual. When you register or interact with our Platform, we may collect:

- Your full name, date of birth, and nationality.
- Contact details such as your email address, phone number, and residential or business address.
- Financial details, including bank account information or investment details, necessary for processing transactions or providing services.
- Identification documents, such as your passport or Emirates ID, which may be required for regulatory and compliance purposes.
- Entity-related details, including but not limited to the company name, registration details, and documents relevant to the company's identity. Users uploading such details affirm that they have the requisite authority to provide this information and that all submissions are accurate and lawful.

#### b. Non-Personal Information

Non-personal information refers to data that cannot directly identify an individual. This includes:

• Technical data, such as your browser type, IP address, and device information.

- Website and application usage data, including pages viewed, time spent on the Platform, and actions taken.
- Cookies and other tracking technologies to understand user behavior and preferences.

#### How Do We Collect Your Data

We collect your data through various methods, including direct interactions when you register, fill out forms, make transactions, or contact our customer support team. Additionally, we use automated technologies such as cookies, server logs, and other tracking mechanisms during your visit to our Platform. We may also obtain data from third parties, including partners, affiliates, or publicly available sources, where permitted by law. By interacting with our Platform, you consent to these data collection practices.

## 2. How We Use Your Information

The information we collect is used to enhance your experience, fulfill legal obligations, and improve our services. Specifically, we use your data for the following purposes:

- Account Management and Verification: To register your account, verify your identity, and manage your access to the Platform.
- Transaction Processing: To facilitate your investments, process payments, and provide necessary financial updates.
- Regulatory Compliance: To adhere to legal and regulatory requirements set forth by authorities such as DFSA and other relevant bodies.
- Communication: To provide you with updates about our services, respond to your inquiries, and inform you about changes to our policies.
- Improvement of Services: To analyze usage patterns and enhance the functionality, performance, and user experience of our Platform.

We ensure that your data is only used for the stated purposes and handle it in compliance with applicable laws and regulations.

By providing your personal information and using our Platform, you explicitly consent to the collection, use, disclosure, and processing of your data as outlined in this Privacy Policy. This consent includes, but is not limited to:

- Receiving communications and updates regarding our services.
- Sharing your information with authorized third parties as detailed in Section 3 ("Sharing Your Information").

• The transfer and processing of your data to jurisdictions outside your country of residence as outlined in Section 8 ("International Data Transfers").

You may withdraw your consent at any time by contacting us at customercare@equityown.com, subject to applicable legal and contractual restrictions.

## 3. Sharing Your Information

We respect your privacy and will only share your data under the following circumstances:

- Regulatory Disclosure: When required by law or to comply with regulatory obligations, such as reporting to the DFSA or other government bodies.
- Service Providers: With trusted third-party vendors who assist us in providing services, such as payment processors and IT infrastructure providers. These parties are bound by strict confidentiality agreements.
- Legal Obligations: To protect the rights, property, or safety of our users or others, or to enforce our terms and conditions.
- We may share your personal information, including your contact details and other relevant data, with our clients for the purposes of providing services, fulfilling marketing objectives, or facilitating business opportunities. By providing your information on our Platform, you explicitly consent to this sharing arrangement.

## 4. Cookies and Tracking Technologies

To improve your experience on our Platform, we use cookies and similar technologies. Cookies are small data files stored on your device that help us:

- Recognize returning users and personalize content.
- Monitor site usage and analyze performance metrics.
- Enhance functionality and simplify navigation.

You can manage your cookie preferences through your browser settings. However, disabling cookies may limit certain features of the Platform. Additionally, you may adjust your preferences for certain third-party cookies using opt-out mechanisms.

### 5. Data Security

We take your data security seriously and have implemented robust measures to protect your information. These include:

- Encryption: We use SSL encryption to secure data transmission between your device and our servers.
- Access Controls: Only authorized personnel with legitimate business needs can access your information.
- System Monitoring: Regular audits and security updates ensure vulnerabilities are addressed promptly.

Phishing Protection: We will never request sensitive information, such as credit card details or identification numbers, via unsecured channels. Users are encouraged to report any suspicious communications to customercare@equityown.com.

While we take extensive precautions, no data transmission over the internet is completely secure. We urge you to take steps to protect your personal information.

#### 6. Data Retention

We retain your data for as long as necessary to fulfill the purposes outlined in this Privacy Policy or as required by law. Once your data is no longer needed, it will be securely deleted or anonymized. For archival purposes, certain data may be retained in compliance with legal obligations.

### 7. Your Rights

Under applicable data protection laws, you have the following rights:

- Access and Correction: Request access to your personal data and correct inaccuracies.
- Data Portability: Obtain a copy of your data in a portable format.
- Erasure: Request the deletion of your data, subject to legal and contractual obligations.
- Objection to Processing: Withdraw consent or object to the processing of your data.
- Lodge Complaints: File a complaint with the relevant regulatory authority.

You may opt out of receiving communications or modify their preferences through their profile settings or by contacting us at [Insert Contact Email]. Requests to withdraw consent or amend information will be processed promptly upon verification of identity.

We will cooperate with regulatory authorities to address concerns and ensure compliance. For grievances, users may contact our appointed Data Protection Officer (DPO) at dataprotection@equityown.com

### 8. International Data Transfers

Given the global nature of our operations, your data may be transferred to jurisdictions with different data protection laws. By using our Platform, you consent to the transfer and processing of your information in the UAE and other countries as required.

## 9. Third-Party Links

Our Platform may contain links to third-party websites or services. These external platforms operate independently, and we are not responsible for their privacy practices. We encourage you to review their policies before providing any personal data. We partner with third-party advertising companies to serve personalized advertisements on our Platform. These companies may use cookies or similar technologies to collect information about your visits and preferences. You can opt out of personalized advertising in your account settings.

## 10. Children's Privacy

Our Platform is intended for users aged 18 and above. We do not knowingly collect personal data from minors. If we become aware that a minor has provided us with personal data, we will take steps to delete such information.

## 11. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. Updates will be posted on our Platform, and the revised policy will take effect immediately upon publication. We encourage you to review this Privacy Policy periodically.

### 12. Disclaimer of Warranties:

The Company provides all services 'as is' and 'as available' without any express or implied warranties, including but not limited to merchantability, fitness for a particular purpose, or non-infringement. Users agree to use the Platform at their own risk.

## 13. Limitation of Liability:

In no event shall the Company be liable for any indirect, special, incidental, or consequential damages arising from the use of the Platform or services. The Company's total liability for any claim shall not exceed the fees paid by the user in the preceding [Insert Number] months.

# 14. User Obligations:

You agree not to use the Platform for unlawful purposes or in ways that could damage or impair its functionality. Any unauthorized reproduction, distribution, or commercial use of content from the Platform is strictly prohibited.

15. Governing Law and Jurisdiction: This Privacy Policy is governed by the laws of Government of UAE. Any disputes arising from this Policy shall be resolved exclusively in the courts of Dubai.

### 16. Contact Us

If you have any questions, concerns, or requests related to this Privacy Policy, please contact us:

EQUITYOWN Email: customercare@equityown.com

Phone: +971567771006

Address: EQUITYOWN TECH LLC FZ, Meydan Free Zone, Dubai, United Arab Emirates

Last updated on: 25 Jan 2025