

**Revision: February 25, 2023**

**Introduction & Conditions of Use**

Freedom is a private limited company that is incorporated in Dubai. Freedom is registered at DUQE SQUARE BUSINESS CENTER, Mina Rashid – Queen Elizabeth II, PO Box 554789, Dubai, UAE with registration no E0209784

References in this Agreement "Freedom", "we", "our" or "us", are to Freedom, and references to "you" or "your" are to the person or legal entity with whom Freedom enters into this Agreement.

By accessing, viewing, signing up or opening an account through our Platforms, or mobile applications (collectively the "**platform**"), you agree that you have read, understood, and accept all the terms and conditions contained here, as well as our Platform User agreement, Cookie Policy and other relevant documents along with this privacy.

**Acronyms**

AML	Means, anti-money laundering.
CTF	Means, counterterrorist financing.
DIFC	Means, the Dubai International Financial Centre.
DFSA	Means, the Dubai Financial Services Authority.
DD	Means, due diligence.
KYC	Means, Know your costumer.
PEP	Political exposed persons
Platform	Website, mobile apps etc....
UAE	Means, the United Arab Emirates.
User	Means, costumers at the AI Investment platform.

### **Definitions**

‘Personal data’ means any information relating to you that can use in identifying you such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity information of you.

‘processing’ means any operation or set of operations which is performed by us on your personal data or sets of personal data, whether or not by automated means, which may include collection, recording, organizing, structuring, storage, amendment, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

‘Biometric data’ means personal data resulting from specific technical processing relating to your physical, physiological, or behavioral characteristics, which allow or confirm us regarding your unique identification, such as facial images, fingerprints, or any other dactyloscopy data;

‘Cross-border processing’ means the processing of your personal data which takes place in more than one country or the country other than your country of residence or the country from where you sign up with us.

“Affiliates” are our authorized partners through contractual agreements that promote our products and services using their marketing and technology network. The affiliate partner has rewarded a payout for providing a specific result to the retailer or advertiser.

“Platform” means our websites or mobile applications.

### **What sort of data do we collect?**

We may require your Personal Information which includes information for identification, future contacts, correspondence, and KYC purpose. In addition to personal information, we may also collect demographic information. We may also require some information to assess your trading experience, your approximate annual income, and your approximate net worth to assess your financial position and suitability for entering transactions with us.

In reference to above, below is a list of the data we collect. There can however be cases where we need to ask for further information from you.

In special cases there can also be data not listed below we need to obtain from third parties. In these cases, you will also be informed about this unless we are forbidden to do so according to legislation and/or authorities.

The data Freedom collects:

- Name
- Home address

- Work address
- Telephone number
- Utility bills
- Mobile number
- Email address
- Passport number
- National ID card
- Social Security Number (or equivalent)
- Driver's license
- Bank details/account numbers
- Tax file number
- Credit/Debit card numbers
- Social media posts
- IP address (EU region)
- Location/GPS data
- Devices/Hardware information
- Cookies
- Pep status
- System Information such as device identifiers, and telemetry (such as IP or MAC address).

Other than data mentioned above, based on applicable anti-money laundering laws (“AML Laws”), we also require copy/picture/scan of some documents that include

- passport/National Identity Card (if applicable)
- driver's license
- utility bills.
- trust deed.
- a credit or bankruptcy check; and/or
- other information we consider necessary to our functions and activities

In the case of a company account, we may be requiring information regarding the company as well as its management, Board of Directors, shareholders, beneficial owners of the client, and persons dealing with us, etc.

the above-mentioned information may be increase from time to time with to any amendment AML Laws or update in our internal policies, procedure, and practices.

In case an individual/company provide us with incomplete, false, or inaccurate information, we reserve the right to not to provide our products. or services or discontinue services or terminate our relationship without further notice. In that case, we may not provide the expected profits and reserve the right to file litigation against such customers.

### **How we collect your data?**

Freedom collects and process your personal data when:

- You contact us, whether through our website, our apps, and upload or send information. This could be when you register, doing a deposit, buying a package, have a question etc.
- When you use and interact with our website or our apps. This could be log in, use of services, buying of package etc.
- When you use our social media. This could be comments on posts, like a post etc.
- From our third-party providers/partners. This could be pep status, verification of addresses etc.

Through our websites, we may also gather information about visitors and their needs and preferences through our use of cookies. This may include following data

- number and frequency of visitors
- Which browser you are using
- Which pages of the Platform you visit
- Your default language settings on your browser
- Your IP addresses
- Selections and confirmations you have provided us with previously (but only if you have specifically requested that we remember such information for the next time you visit the Platform)

The data collected is statistical in nature and is not generally attributable to any individual, as further detailed in [our Cookie Policy](#). Generally, such data shall be processed on an aggregate basis instead of any particular individual. However, if you are a visitor who has entered a Platform via a click-through link in an email which we have sent you, or through our affiliates, marketing partners, social media, additional information about you, including information about the pages you visit within the Platform, the documents you download and other information which can help us personalize our future interaction with you may be collected, and in this case, the information collected about you from this Platform may be associated with other identifying information that we have about you.

### **Why do we collect them?**

Freedom only collects data where it is relevant to and necessary for specified, explicit and legitimate purposes determined at the time of its collection.

We collect and process identity information and Sensitive Personal Data to comply with our Know Your Customer (“KYC”) obligations under applicable laws and regulations, and AML/CTF laws and regulations.

Provide, troubleshoot, and improve our services. We use your personal information to provide functionality, analyze performance, fix errors, and improve the usability and effectiveness of our services.

### **Who will we share your data with?**

Authorities as government bodies and law enforcement agencies where we are obligated by law and in response to legal and regulatory requests.

We may also disclose your personal data to relevant persons within our group of companies including current or the future companies, our Affiliates, third-party service providers, agents, subcontractors, and other organizations for the purposes of providing services to us or directly to you on our behalf.

Examples include analyzing data, providing marketing assistance, processing payments, transmitting content, and assessing and managing credit risk. These third-party service providers only have access to personal information needed to perform their functions and may not use it for other purposes. Further, they must process the personal information in accordance with our contractual agreements and only as permitted by applicable data protection laws.

Freedom will as our obligations to fulfill regulatory demands exchanging information with other companies and organizations for fraud protection, combating the money laundering, and credit risk reduction etc.

In order for us to provide you the best user experience, we may share your personal information with our marketing partners for the purposes of targeting, modeling, and/or analytics as well as marketing and advertising. You may opt-out of sharing personal information with our marketing partners unless we have a legitimate interest to do so.

As we continue to develop our business, we might sell or buy other businesses or services. In such transactions, user information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, the user consents otherwise). Also, if Freedom or substantially all its assets are acquired, user information will be one of the transferred assets.

we may also share your financial, personal or sensitive information without any notices to any person you authorized to act on your behalf e.g., your financial adviser, solicitor, settlement agent, accountant, executor, administrator, trustee, guardian or attorney etc.

in some situations where it's necessary to share your information or part of information for completing transactions or to provide you with our products and services through associated business e.g., banking, payments, data processing, marketing and advertising, data analysis, business intelligence, website and technology services

In order to comply with regulatory requirements, we may also share your information with auditors we appoint to ensure the integrity of our operations

### **Cross Boarder Sharing**

Our internal operations are not limited to one single country. The disclosure of your Personal Data to the recipients set out above may involve the transfer of Personal Data to a different country other than your own country of residence. Collection, processing, and storage of your information may require us to transfer your information in UAE, Pakistan, and Denmark to any country located worldwide where our business partner or affiliates reside. Accordingly, Personal Information may be accessed from countries where Freedom, its business partners, or its affiliates have operations.

By using our Platforms or providing any personal information or by signing up with us, you acknowledge and accept the transfer, processing, and storage of such information outside of the country of your residence where data protection standards may be different.

### **How do we secure your information?**

Freedom will as the controller of your data, take the necessary organizational and technical measures to ensure that by default your data is protected and is not made accessible without the consent of the individual. Freedom controls the access to your personal data of you and the way the data is processed, stored, and accessed in the future.

Freedom emphasizes the importance of all data security and processing with pseudonymization (anonymization) and encryption of the data of the users, regular testing, evaluation and assessing to measure the effectiveness to ensure the security of the data.

We have implemented systems and controls to protect your Personal Information, however, we cannot guarantee the security of any data transmitted to us via email, websites, or webmail, as the transmission of data is at your own risk. Prior to delivery, your communications might have been routed to us via multiple platforms involving several countries.

Once you sign up, you will have a unique combination of username and password to access your account as well as personal information online. We will not be responsible for any compromise of the same from your side. We also suggest you do not share any personal information that you don't want to be used by anyone else when interacting on social networking, group chat, and forum features.

### **Processing methods**

We may process your Personal Information using automated techniques or manual methods or a combination of both. When automated methods are used to assist in decision-making, we may manually review some of the highlights or indicators generated by the automated methods on the data being processed. Such manual review may be conducted by our employees or employees of

our affiliates or business partners who are processing on our behalf. In order to protect your personal information, manual access to such staff shall be under obligations of confidentiality as well as through password protected systems.

### **How Long is the Personal Information stored?**

Generally, we keep your personal information to enable your continued use our services, for as long as it is required in order to fulfil the relevant purposes described in this document, and as may be required by law such as for tax and accounting purposes, compliance with AML/CTF laws, or as otherwise communicated to you.

However, in some situations, retaining the period of retaining your personal as well as transactional and other data may exceed a general record retention period as mentioned in above para. such situations may include but not limited to the following.

- legal obligations to which we or one of our affiliates are required to retain for a longer period.
- Removal or destruction of record may cause a damage in legal position with respect to current or possible litigation, regulatory audits, or investigations by legal authorities
- If we understand that retention of record may help any legal case or court of law in any case in our knowledge.
- In case we have reasons to believe to serve you in future with upcoming products and services
- If our marketing or research team require for documented reason.

### **Cookies**

Cookies are small text files sent from the web server to your computer. These cookies enable us to put in place personal settings and load your personal preferences to improve your experience.

We use cookies and similar tools to enhance your user experience, provide our services, and understand how customers use our services so we can make improvements. Depending on applicable laws in the region you are located in, the cookie banner on your browser will tell you how to accept or refuse cookies.

sometimes Internet browsers are set up to accept cookies automatically. We suggest you to your browser to notify you when you receive a cookie, allowing you to decide whether to accept it or not. However, when you choose to not to accept cookies or similar devices may not be able to access or have limited access to those pages or products and services thereon.

Cookies used by us do not contain any Personal Information nor do they contain account or password information. We do not control or take any responsibility for the use of cookies by third parties.

### **Your rights regarding your personal data**

It's important that your information we maintain about you is accurate and current. We may provide you limited rights to correct or update some of your personal information. You have the right to request access to, correct, and delete your personal data. You may also object to our processing of your personal data or ask that we restrict the processing of your personal data in certain instances:

- You have the right to obtain confirmation that your data are processed and to obtain a copy of it as well as certain information related to its processing.
- You can request the rectification of your data which are inaccurate, and also add to it. You can also change your personal information in your account at any time.
- You can, in some cases, have your data deleted.
- You can object, for reasons relating to your particular situation, to the processing of your data. For instance, you have the right to object to commercial prospecting.
- In certain circumstances, you have the right to limit the processing of your data.
- For processing requiring your consent, you have the right to withdraw your consent at any time. Exercising this right does not affect the lawfulness of the processing based on the consent given before the withdrawal of the latter.
- If you die, you have the right to define instructions relating to the retention, deletion, and communication of your data after your death.
- Right to lodge complaint to the relevant data protection authority. Which could be done by following link <https://www.dfsa.ae/make-enquiry>.

### **Change of policy**

We reserve the right to change any of our policy without any notice. we will post the revised version here with an updated revision date. Any changes to this Privacy Policy will become effective when posted. It is therefore your responsibility to check our Platform frequently to remain updated with our policies including review any changes to this privacy policy.

If there are material changes, we may notify you by other means, such as by posting a notice on our Platforms or sending an email on your registered email address or sending a notification in your



account etc. There may be situations when you will be requested to log on the Platform to accept the new policy. If you do not accept these changes, we may limit your access to our Platform and our services.

### **Contact Information**

If there are any questions or any further information required regarding our products, services, or related to any policy. Please write us in the English language on [support@myfreedom.ltd](mailto:support@myfreedom.ltd)