

## **PRIVACY POLICY**

This Privacy Policy (“Policy”) covers how JM Financial Brokerage Services Co. (“JM Financial”) uses and stores your personal information.

At JM Financial we are committed to protecting your privacy. Please review this Policy carefully prior to registering with us. Once you register with us, or ask us to provide you with any of our products or services, you agree that we may require the following information from you to process your application (including but not limited to):

- If you are opening an individual account with us, we will request the following information:
  - ✓ Name,
  - ✓ Address,
  - ✓ Phone number, fax and/ or email,
  - ✓ Proof of residency, and
  - ✓ A form of photographic ID (passport, national ID or driver’s license).
- If you are opening a corporate account with us, we may in addition to the above listed documents require the following information in order to process your application:
  - ✓ Name of beneficial owners,
  - ✓ Certificate of Incorporation,
  - ✓ Articles of Association,
  - ✓ Shareholder information,
  - ✓ Names of authorized signatories and their position in the company.

We collect this information in order to meet our regulatory obligations and to determine whether you meet the criteria set out by the Markets in Financial Instruments Directive as well as the Anti- Money Laundering Guidelines in The State of Kuwait to set-up an account with JM Financial. This information is gathered by our account application form which you submit directly to us.

We update our Policy periodically and we will inform you by email when and if this happens. The latest and prevailing version of this Policy will at all times be available at [www.jmtrade.com](http://www.jmtrade.com). Any revised Policy will be effective immediately upon posting it on our Website.

We use your information for the following purposes:

### **Registration and administration**

The information collected by us is used to administer, operate, and facilitate your contractual relationship with us. This may include sharing the information between JM Financial, our group companies and to third parties as described below in the section “Disclosure of Information”. When sharing such information, we adhere to all applicable legal and industry standards regarding protection of personal information and data.

Besides the day-to-day operation of your account, we may use the information to create statistical data in order to fulfil our legal and accounting requirements, analyze our business, as well as managing risks and internal business procedures. If we wish to use your information in a manner different than the purpose for which it was collected, we will ask you for your consent prior to such use.

### **Communication**

When applying for an account with us or when providing your contact details via this Website, you can expect to be contacted by us via telephone and/or email in relation to the account and/or announcements or updates to the products and services.

Whenever sending an email or other communication to us, we may retain this communication in order to process your queries, respond to requests and/or improve our services.

### **Disclosure of Information**

#### 1- Within JM Financial:

In order to provide you with our services, JM Financial may disclose your information to any of our group companies. By sharing your personal information, we will ensure that the same level of protection is afforded to you as is applied by JM Financial.

#### 2- To third parties:

A disclosure to a third party may include the following:

- Credit reference agencies or other organizations that help us and others make credit decisions and reduce the incidence of fraud.

- In the course of carrying out identity fraud prevention or credit control checks.
- To regulators and governmental agencies in any jurisdiction, where we are required to do so by law; and/or
- Where there is a public duty to disclose such information.

We will not disclose your personal information to third parties, except for as described in this Policy.

### **Prevention and detection of crime**

We may need to pass your information on to Governmental departments, regulatory bodies (including Ministry of Commerce), the police, law enforcement agencies or to a court of law. This would be done, for example, to assist in the prevention of a crime (money laundering/fraud), to meet legal requirements or for other lawful purposes.

### **Correcting and updating of information**

It is important that the personal data we hold about you is accurate, complete, and true at all times, as such please do keep us informed if your personal data changes during your business relationship with any of the JM Financial related entities. In addition, you provide your implied consent for data processing/transmission/record keeping/ as between the said related entities, wherever such entities may be located, registered and/or operating.

### **Right of access to your information**

You have the right to access some, or all of the information held about you by JM Financial. You can obtain this insight by making an inquiry to us in writing. We reserve the right to claim a small fee for sending the material as assessed on a case-by-case basis. All requests should be sent via the Compliance Department.

### **Monitoring**

We record all our telephone calls for security and training purposes. Emails and other messaging systems are also monitored.

## **Information Security/Storage**

JM Financial stores all information on our servers within the State of Kuwait. Backup servers are securely located outside the State of Kuwait.

We use secure servers to store your information and ensure proper data storage. Your information is kept encrypted for safety measures.

The privacy and confidentiality of your personal information is of fundamental importance to us. We take all appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data and personal information.

We restrict access to personal information to employees, contractors and agents in order to operate, develop or improve our services.

Transmission of data on the internet can never be ultimately secure. We do not and cannot guarantee security of information collected electronically or transmitted; however, we take all necessary steps to provide the best security available. As a result of our inability to guarantee safety, you are submitting information to us at your own risk.

## **COOKIES**

A cookie is a small file of letters and numbers downloaded on to a device when the user accesses certain websites. A cookie will allow a website to recognize a user's device.

A cookie will contain the name of the internet location (the domain) from which the cookie has come and the lifetime of the cookie (a cookie will usually expire after a certain period).

### **How we use Session cookies**

We use session cookies to allow you to carry information across pages of our site and avoid having to re-enter information.

### **Persistent cookies**

We use persistent cookies:

- From time to time to help us recognize you as a unique visitor when you return to our website and to monitor your use of our website.

- To allow us to link you to any of our partners or affiliates should you come to our website through a paid advert or banner on a website of an affiliate or partner.