



## Privacy Policy

### 1. Introduction

Anax Capital Financial Markets LLC (hereinafter the “Company”, “we”, “Anax Capital”) is regulated and authorized by the Securities and Commodities Authority (“SCA”) with commercial license number License No: 20200000258 to carry out the following financial activities within the First Category license (Dealing in Securities): (i) Trading broker of OTC derivatives and currencies in the spot market; (ii) Trading broker in the international markets. Our registered office is at Anax Capital Financial Markets LLC, Office 4702, 47<sup>th</sup> Floor, Aspin Tower, Sheik Zayed Road, Dubai, UAE.

This Privacy Policy (the “Policy”) explains how Anax Capital collects, processes, and discloses personal information through its websites, mobile applications, and all other online products and services that fall under this Policy (collectively, the “Services”) or when clients otherwise interact with us.

Anax Capital is responsible for protecting the privacy and safeguarding the personal data of our clients, including (i) Retail Clients, (ii) Professional Clients, and (iii) Eligible Counterparties, as well as website visitors (hereinafter “you”).

Your privacy is important to us. This Privacy Policy outlines how we collect, process, and manage personal data in accordance with Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (hereinafter, the “Data Protection Law”).

For any questions or concerns regarding your personal data, please contact us at: [support@anaxcapital.ae](mailto:support@anaxcapital.ae)

### 2. What Kind of Personal Data Do We Collect?

We may collect and process the following categories of personal data:

- **Identity Data** (e.g., full name, date of birth, nationality, tax number, identification documents, etc.).
- **Contact Data** (e.g., email address, telephone number, residential address, etc.).
- **Screening Data** (e.g., political background, sanctions, criminal records, and adverse media checks).
- **Risk Assessment Data** (e.g., client risk score and categorization).
- **Economic and Appropriateness Data** (e.g., income, source of income, investment experience, trading objectives).

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- **Financial Data** (e.g., bank account and payment details).
- **Transaction Data** (e.g., payments, trading activity, etc.).
- **Technical Data** (e.g., IP address, login data, browser type, device information).
- **Communication Data** (e.g., chats, emails, call recordings).
- **Profile Data** (e.g., username, preferences, feedback, survey responses).
- **Usage Data** (e.g., user session information, interactions with our services).

### 3. Purpose and Lawful Basis for Data Processing

We process personal data in accordance with applicable data protection laws and regulations. The lawful basis for processing depends on the specific purpose for which the data is collected. Below is a detailed outline of the purposes and the corresponding lawful bases:

#### 1. Account Creation

- Purpose: To create and manage user accounts, facilitate platform access, and ensure seamless onboarding experience.
- Type of Data Processed: Identity, Contact, Technical, Economic, and Appropriateness Data.
- Lawful Basis: Performance of a contract – Processing is necessary to establish and manage user accounts as part of our contractual obligations.

#### 2. Identity Verification & Compliance Checks

- Purpose: To verify user identity, conduct due diligence, and comply with Anti-Money Laundering (AML) and Counter-Terrorism Financing (CFT) regulations.
- Types of Data Processed: Identity, Contact, Screening, Risk, Financial, Transaction, and Communication Data.
- Lawful Basis: Legal obligation – Processing is required to meet regulatory and compliance obligations, including financial crime prevention laws.

#### 3. Providing Services & Processing Transactions

- Purpose: To deliver financial and trading services, execute transactions, and maintain service functionality.
- Type of Data Processed: Identity, Contact, Financial, Transaction, Technical, and Profile Data.

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- Lawful Basis: Performance of a contract – Processing is necessary for providing financial services and fulfilling contractual obligations.

#### **4. Fraud Prevention & Risk Management**

- Purpose: To detect, prevent, and investigate fraudulent activities, security threats, and suspicious transactions.
- Type of Data Processed: Identity, Contact, Screening, Risk, Financial, Transaction, Technical, and Usage Data.
- Lawful Basis: Legal obligation – Processing is necessary to comply with fraud prevention and AML/CFT regulations.

#### **5. Customer Support**

- Purpose: To provide assistance, resolve inquiries, manage complaints, and enhance customer experience.
- Type of Data Processed: Identity, Contact, Financial, Transaction, and Technical Data.
- Lawful Basis: Performance of a contract – Processing is necessary to fulfill customer service commitments under the user agreement.

#### **6. Service Notifications**

- Purpose: To send account-related communications, security alerts, transaction confirmations, and policy updates.
- Type of Data Processed: Contact and Communication Data.
- Lawful Basis: Performance of a contract – Processing is required to provide important service-related notifications.

#### **7. Marketing & Promotions**

- Purpose: To send promotional offers, newsletters, and personalized marketing content based on user preferences.
- Type of Data Processed: Identity, Contact, Financial, Transaction, Technical, Profile, and Usage Data.
- Lawful Basis: Consent – Users must provide explicit consent to receive marketing communications, which can be withdrawn at any time.

#### **8. Data Analytics & Business Improvement**

- Purpose: To analyze usage patterns, improve platform performance, and develop new features.

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- Type of Data Processed: Technical and Usage Data.
- Lawful Basis: Consent – Processing occurs with user consent to enhance our services and optimize user experience.

#### **9. Legal & Regulatory Compliance**

- Purpose: To comply with applicable laws, regulatory requirements, law enforcement requests, and legal proceedings.
- Type of Data Processed: Identity, Contact, Financial, and Communication Data.
- Lawful Basis: Legal obligation – Processing is necessary to meet legal and regulatory obligations imposed on our company.

#### **10. Security & System Integrity**

- Purpose: To maintain the security, confidentiality, and integrity of our systems and prevent unauthorized access.
- Type of Data Processed: Identity, Technical, and Usage Data.
- Lawful Basis: Legitimate interest – Processing is essential to safeguard our systems and protect user data.

#### **11. Dispute Resolution & Enforcement of Terms**

- Purpose: To resolve disputes, enforce contractual agreements, and manage legal claims.
- Type of Data Processed: Identity, Contact, Financial, Transaction, and Communication Data.
- Lawful Basis: Legitimate interest – Processing is necessary to protect our legal rights and ensure compliance with terms of service.

#### **12. Third-Party Integrations & Partner Services**

- Purpose: To integrate with third-party services (such as payment providers, analytics tools, or identity verification partners) to enhance service offerings.
- Type of Data Processed: Identity, Contact, Financial, Transaction, and Technical Data.
- Lawful Basis: Performance of a contract or legitimate interest – Processing is required for service functionality and efficiency.

#### **4. Cookies**

We may use cookies to enhance user experience. For more details, refer to our Cookie Policy.

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## 5. Sources of Personal Data

We collect personal data from:

- Direct interactions (e.g., account registration, service usage, customer support inquiries).
- Third parties (e.g., financial institutions, KYC service providers, analytics vendors).
- Automated technologies (e.g., cookies, log files).

## 6. Automated Decision-Making

We may use automated processing for:

- Client risk profiling and categorization.
- Fraud prevention.
- Economic suitability assessments.

You have the right to object to automated decision-making under applicable laws.

## 7. Data Protection Measures

We implement technical and organizational measures to protect your data from loss, misuse, and unauthorized access.

## 8. Data Retention

We retain personal data for a minimum of **10 years** after the end of the business relationship, in accordance with **SCA regulations**. In certain cases, data may be retained longer for legal or regulatory purposes.

## 9. Your Rights

Under the Data Protection Law, you have the right to:

- Access your personal data.
- Correct inaccurate data.
- Withdraw consent and request data erasure (subject to legal obligations).
- Restrict or object to data processing.
- Lodge a complaint with the UAE Data Office.

To exercise your rights, contact [support@anaxcapital.ae](mailto:support@anaxcapital.ae).

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## 10. Data Sharing & Transfers

We may share your data with the following entities:

1. **Regulatory Authorities & Government Entities:** When required by UAE law or for compliance with financial and regulatory obligations.
2. **Financial Institutions & Payment Service Providers:** To process transactions and ensure secure payment processing.
3. **Affiliated Companies & Business Partners:** For operational support and improved service delivery.
4. **Identity Verification & Screening Service Providers:** To perform KYC, AML, and risk assessment checks.
5. **Cloud Storage & IT Service Providers:** To securely store and manage personal data.
6. **Marketing & Analytics Providers:** To personalize and improve our marketing communications and services.
7. **Anti-Fraud & Security Providers:** To detect and prevent fraudulent activities.
8. **Legal & Professional Advisors:** For compliance, risk management, and legal consultations.
9. **Customer Support & Communication Platforms:** To provide efficient support and service notifications.
10. **Cross-Border Transfers:** When necessary, we ensure data transfers comply with UAE Data Protection Law and apply standard contractual clauses where required.

## 11. Updates to this Policy

We may update this Privacy Policy periodically. Changes will be published on our website.

## 12. Contact Information

For any questions about this Policy or your personal data, contact us at:

Email: [support@anaxcapital.ae](mailto:support@anaxcapital.ae).

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