

# SANANBIL Capital Ltd. Privacy Policy Statement

February 2024  
Version 1.0



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## 1. Introduction

**SANABIL CAPITAL LTD (ex Oryx Capital Ltd)** is a Securities Dealer Licensee regulated and authorized by the Financial Services Authority ('FSA') in Seychelles under the license number SD173 (hereinafter referred to the "Company").

We understand the importance of maintaining the confidentiality and privacy of personal information that we hold about our clients and other third parties. This Privacy Policy Statement (hereinafter 'this Statement') outlines how we manage and protect the personal information you give us and hold about our clients. By visiting our website and using our services, your agreement to this Policy is implied.

This Policy will be reviewed periodically to take account of changes to our operations or practices and, further, to make sure it remains appropriate to any changes in law, technology and the business environment. You should check this Statement from time to time to ensure that you are happy with any changes. Any information held will be governed by our most current Policy.

## 2. Collection and processing of personal information

In order to open an account with us, you must first complete and submit an application form to us by completing the required information. By completing this application form, you are requested to disclose personal information in order to enable the Company to assess your application and comply with the relevant rules and regulations. The information you provide may also be used by the Company to inform you regarding its services.

We obtain this information in a number of ways through your use of our services including through any of our websites, apps, the account opening applications, our demo sign up forms, webinar sign up forms, subscribing to news updates and from information provided in the course of ongoing customer service communications. We may also collect this information about you from third parties such as through publicly available sources.

The personal data you provide us with, is used to verify contact information and identity. We also use personal data to register clients, open and configure trading accounts, and issue activation codes and passwords. By providing contact information, you help us improve our services and promptly communicate the availability of additional services, features, and promotions we may be offering.

If you choose not to provide the information, when we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

### **3. How we use cookies**

When you use our website, we will use cookies to distinguish you from other users of our website. This helps us to provide you with a more relevant and effective experience when you browse our website, including presenting websites according to your needs or preferences and allows us to improve the site generally.

### **4. Disclosure of the personal information**

The Company shall not disclose any of its clients' confidential information to a third party, except:

- (a) to the extent that it is required to do so pursuant to any applicable laws, rules and/or regulations; and/or
- (b) if there is a duty to the public to disclose; and/or
- (c) if our legitimate business interests require disclosure; and/or
- (d) at your request or with your consent or to persons described in this Statement. The Company will endeavour to make such disclosures on a 'need-to-know' basis, unless otherwise instructed by a regulatory authority. Under such circumstances, the Company will notify the third party regarding the confidential nature of any such information.

Depending on the products and services concerned and the relevant restrictions on sensitive data, personal information may be disclosed to:

- potential successors in title to our business;
- third party consultants, contractors or other service providers who may access your personal information when providing services (including but not limited to IT support services) to us;
- any organisation or person acting on your behalf to whom you request us to provide information, including your financial advisor, broker, solicitor or accountant;
- third parties where it is necessary to process a transaction or provide services you have requested;
- to a Trade Repository or similar;

- Banks (where they request additional information following payments that you have made);
- credit providers, courts, tribunals and regulatory authorities in response to legal and regulatory requests or other government agencies, as agreed or authorised by law;
- auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes, in any jurisdiction where we operate;
- at your request or with your consent.

## **5. How we obtain your consent**

Where our use of your personal information requires your consent, such consent will be provided in accordance with the express written terms which govern our business relationship (which are available on our website(s) as amended from time to time), or any other contract we may have entered into with you or as set out in our communication with you from time to time.

By submitting any personal information (including, without limitation, your account details) to us, you consent to the use of information as set out in this Statement. We reserve the right to amend or modify this Statement and if we do so, we will post the changes on the Website. It is your responsibility to check the Privacy Policy when you submit information to us. Your use of the Website will signify that you agree to any such changes.

If we rely on your consent as our legal basis for holding and processing your personal information, you have the right to withdraw that consent at any time by contacting us, using the contact details set out in this Privacy Policy.

## **6. Storage of your personal information and retention period**

Safeguarding the privacy of your information is of utmost importance to us, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium. We will hold personal information, for as long as we have a business relationship with you, in a combination of secure computer storage facilities and paper-based files and other records and we take the necessary measures to protect the personal information we hold from misuse, loss, unauthorized access, modification or disclosure.

When we consider that personal information is no longer necessary for the purpose for which it was collected, we will remove any details that will identify you or we will securely destroy the records. However, we may need to maintain records for a significant period of time. For example, we are subject to certain anti-money laundering laws which require us to retain the following, for a period of seven (7) years after our business relationship with you has ended:

- a copy of the documents we used in order to comply with our customer due diligence obligations;

- supporting evidence and records of transactions with you and your relationship with us.

Also, the personal information we hold in the form of a recorded communication, by telephone, electronically, in person or otherwise, will be held in line with local regulatory requirements (i.e. 7 years after our business relationship with you has ended). Where you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not want to receive these communications.

We may keep your data for longer than 7 years if we cannot delete it for legal, regulatory or technical reasons.

## **7. Amendments**

We may, at any time and at our discretion, vary this, Policy. We will notify you, if we amend this Privacy Policy, by contacting you through the contact details you have provided to us. Any amended Privacy Policy is effective once we notify you of the change.

## **8. How to contact us**

If you have any questions regarding this Policy, wish to access or change your information, or if you have any questions about security on our website, you may email us at [info@sanabilcapital.com](mailto:info@sanabilcapital.com).

If you have a concern about any aspect of our privacy practices, you can submit a complaint. This will be acted upon promptly. To make a complaint, please contact us via email at [complaints@sanabilcapital.com](mailto:complaints@sanabilcapital.com). Office/Customer Support Department via the Company's