

Definitions

- **"BSF Capital", "us", "we", "our", the "Controller"** means Saudi Fransi Capital, and for the purposes of this notice, the Controller means any Public Entity, natural person or private legal person that specifies the purpose and manner of Processing Personal Data, whether the data is processed by that Controller or by the Processor.
- **"Data subject"** means the individual to whom the Personal Data relates (also referred to as **"you, your"** or **"Client(s)"** in this notice).
- **"Personal Data"** means any data, regardless of its source or form, that may lead to identifying an individual specifically, or that may directly or indirectly make it possible to identify an individual, including name, personal identification number, addresses, contact numbers, license numbers, records, personal assets, bank and credit card numbers, photos and videos of an individual, and any other data of personal nature.
- **"Processing"** means any operation carried out on Personal Data by any means, whether manual or automated, including collecting, recording, saving, indexing, organizing, formatting, storing, modifying, updating, consolidating, retrieving, using, disclosing, transmitting, publishing, sharing, linking, blocking, erasing and destroying data.
- **"Processor"** means any Public Entity, natural person or private legal person that processes Personal Data for the benefit and on behalf of the Controller.
- **"Collection"** means the collection of Personal Data by BSF Capital by the provisions of this Law, either from the Data Subject directly, a representative of the Data Subject, any legal guardian over the Data Subject, or any other party.
- **"Destruction"** means any action taken on Personal Data that makes it unreadable and irretrievable, or impossible to identify the related Data Subject.
- **"Discloser"** means enabling any person - other than the Controller or the Processor, as the case may be - to access, collect or use Personal Data by any means and for any purpose.
- **"Transfer"** means the transfers of Personal Data from one place to another for Processing.
- **"Credit Data"** means any Personal Data related to an individual's request for, or obtaining of, financing from a financing entity, whether for a personal or family purpose, including any data relating to that individual's ability to obtain and repay debts, and the credit history of that person.
- **"Explicit Consent"** means direct and explicit consent given by the Data Subject in any form that clearly indicates the Data Subject's acceptance of the Processing of their Personal Data in a manner that cannot be interpreted otherwise, and whose obtention can be proven.

Privacy Notice

- This privacy notice outlines how to Collect, Process, use, manage, disclose and protect your Personal Data.
- This privacy notice is framed according to the Personal Data Protection Law and its implementing Regulations in the Kingdom of Saudi Arabia.

The Purpose of Collecting, Processing, and Use of Your Personal Data

In order to provide integrated services and products and ensure a high-quality investment experience, such as:

- **Provide Financial Products and Services:** To offer investment banking, asset management, wealth management, debt and equity research, institutional sales and trading, local and international brokerage and any other service or product offered by BSF Capital in the future as one of its investment services.
- **Operational Efficiency:** Ensuring accurate transactional recordings, verification, validation, and efficient billing.
- **Safety & Security:** Ensuring your security through advanced fraud prevention and cutting-edge cybersecurity measures.
- **Regulatory Reporting:** Meeting our obligations to present reports to supervisory bodies, as strictly necessary, maintaining confidentiality to the extent legally permissible.

- **Criminal Activity Monitoring:** Fraud and suspicious activity detection, prevention, investigation, combating money laundering, and terrorism financing.
- **Credit Assessment:** Collaborating with trusted entities and licensed credit bureaus to assess creditworthiness for loan applications or credit extensions.
- **Tailored Financial Offerings:** Using information from your financial actions and preferences to present solutions perfectly attuned to your aspirations.
- **Financial Profiling:** Evaluating your financial behaviors and history to determine your eligibility for specific financial products or services.
- **Enhanced Customer Service:** Addressing your concerns, inquiries, and ensuring a high-quality investment experience.
- **Feedback & Improvement:** Regularly gathering feedback to refine our offerings and heighten your financial experience.
- **Notification:** Timely notification regarding changes in your portfolio and investment account balance or other notifications related to your financial operations (for example: trading, deposit, fund subscription, updating the investment account).
- **Awareness Communication:** Informing you about various security measures, precautions, and best practices to safeguard your accounts and Personal Data. These messages might include tips on avoiding phishing scams, protecting passwords or OTPs, and provide guidance on secure financial practices.

The Process of Personal Data

Processing your Personal Data includes collecting, organizing, storing, analyzing, and using it in a certain form according to specific purposes. Your Personal Data is collected and processed in a manner suitable for the type of services and products offered to you.

Analyzing and using your Personal Data aims to enhance your investment experience and to develop the products and the services provided to you.

Your Personal Data is protected by strong security methods and stored in accordance with applicable laws and regulations, while maintaining high levels of confidentiality. Furthermore, periodic reports are prepared, and the performance of your data Processing process is monitored to ensure ongoing compliance and quality.

We Gather and Use Your Personal Data Based on the Following Legal Basis

- **Contractual Obligation:** To fulfill our contractual obligation to you, offer our services, and maintain the high standards of financial service you expect from us.
- **Legitimate Interest:** Continuous improvement of our services as well as protection of BSF Capital, its clients and employees.
- **Actual interest:** To achieve moral or material interest to you, such as securing your portfolio from any losses.
- **Legal Obligation:** To meet our regulatory and legal requirements as a financial institution operating in the Kingdom of Saudi Arabia.

The Potential Effects and Risks Resulting from Not Completing the Personal Data Collection Process

In the event that BSF Capital is unable to collect your Personal Data, it will not be able to fully provide the services and products to you. As a result, you will not receive the desired service and the contractual relationship between BSF Capital and you may be affected.

Personal Data We Collect, Process, and Use

When you are either a client, legal guardian of one of our clients, contracting party, or a representative of related parties (including those who fully or partially lack legal capacity, corporations, institutions, and other legal entities), we may collect the following data to provide you with our services and products:

- **Personal Data:** Full name, gender, nationality, citizenship, National/Iqama ID, passport, mobile number, email address, telephone number, age, date of birth, place of birth, marital status, national address, personal assets, account number, portfolio number, credit/debit card numbers, account/portfolio

- balance, account transaction data, education level, and any relationship with politically or a sensitive position and relevant data.
- **Credit Data:** Personal income, credit record, property, assets (financial, real state, stock, etc.) investment, tax number, SIMAH report, and any other data about personal credit status.
- **Biometrics Data:** Signature, handwriting, fingerprint, voice, and face recognition data.
- **Health Data:** In some conditions we may collect medical reports, health condition, whether physical, mental or psychological conditions.
- **Other Data:** Personal Data to comply with laws, regulations, regulatory requirements, or to deliver online services, such as location (including geographic location and network IP address), communication records (including video or audio records, phone calls). Personal Data arising from client investigation, e.g., Personal Data collected during client due diligence, sanction or Anti-Money laundering checks.

Certain Personal Data must be collected obligatorily, as it is essential for providing the requested services and products. Additional data is collected optionally in order to improve the quality of the services provided. Personal Data will not be processed in a manner inconsistent with its Collection purpose or the extent permitted by law.

How We Collect Your Personal Data

- When you directly provide us with your Personal Data
- When we collect and verify your Personal Data from other sources, such as, licensed credit bureaus, public entity, financial and regulatory bodies.
- In some cases, we collect certain data based on your consent, which ensures that we use your data only in ways that you agreed to and were not mentioned during or before the beginning of the contractual agreement.

Data Retention, Storage, and Destruction

Your Personal Data will be stored and retained in advanced securely measures such as encryption, coding, for an organized access and for a minimum of ten years or for the duration necessary to fulfill the outlined purposes in this notice. This duration might be changed or extended based on your continued usage and benefiting of our services and products, and/or based on regulatory requirements for the retention of Personal Data or connected information in a manner that does not conflict with the relevant laws and regulations.

Upon the expiration of the designated period(s) or at your request for data Destruction and to the extent technically and legally permitted, such data will be destroyed using advanced data security technologies. Techniques such as secure erasure, physical Destruction, duplexing, and shredding will be employed to ensure the information is rendered irretrievable.

Data Protection

We ensure the security of your Personal Data through the implementation of multiple administrative, organizational, and technical measures, including regular audit processes, staff training, and the establishment of strict policies and procedures to protect against unauthorized access or irregular Processing.

Despite our constant attention and diligence in exercising due care, we do not provide any guarantees regarding the security of third-party links on our websites, if any. Therefore, BSF Capital does not assume any responsibility for the completeness, accuracy, or reliability of third parties (including without limitation software, websites, etc.) which may be linked to our electronic platforms.

How We May Share Your Personal Data

Your Personal Data may be shared where necessary with:

- BSF Capital's Affiliates, subsidiaries.
- To competent authorities, agencies, and/or regulatory bodies, whether for verification purposes, to fulfil regulatory compliance obligations, or for other legal requirements.
- When we use third-party assistance to provide you with access to our website and mobile application.

- Where there is a legitimate interest, public interest, or legal / regulatory obligation.
- To competent authorities for credit assessment and reporting.
- When we use a third-party service to provide you with services and products inside or outside the Kingdom.
- To comply with a regulatory or regulatory requirement.

BSF Capital maintains the strict confidentiality of all Personal Data collected. Personal Data is disclosed only pursuant to legal authorizations or to enhance our services in accordance with our privacy policy. We are committed to applying the highest standards of governance and protection when Transferring Personal Data outside the Kingdom or sharing it with external parties. This is done in full compliance with the Personal Data Protection Law, its implementing Regulations, and all relevant regulations in the Kingdom of Saudi Arabia.

Individual Who Lacks Legal Capacity

We require legal guardian consent for clients who fully or partially lack legal capacity before Processing any Personal Data.

The Rights of the Personal Data Subject and How to Exercise Them

- **Right to be Informed:** You have the right to be informed about the legal basis and the purpose of the Collection of your Personal Data
- **Right to Access:** You have the right to access your Personal Data through the channels provided by BSF Capital, to the extent permitted by law.
- **Right to request Personal Data:** You have the right to access a copy of your Personal Data or receive it in a structured, commonly used, and readable format, either electronically or in print, within a period not exceeding 30 days, to the extent permitted by law. BSF Capital may extend this period by an additional 30 days, and you will be notified of the extension and its justifications.
- **Right to Request Correction of your Personal Data:** You have the right to request correction, completion or updating of your Personal Data available to BSF Capital.
- **Right to Destruction:** You have the right to request the Destruction of Personal Data held by us and that is no longer needed, as long as there is no legal or regulatory obligation to process or retain the data.
- **Right to Withdraw Consent:** You have the right to withdraw your consent to the Processing of your Personal Data at any time to the extent permitted by law, and you must inform BSF Capital of this by any of the means of communication specified in this privacy notice.

The Identity of the Person Collecting Personal Data

BSF Capital is responsible for collecting Personal Data, depending on the various departments, products, and services required, as well as the nature of the relationship with the client.

Privacy Notice Amendments

BSF Capital may update this privacy notice periodically, to ensure compliance with updated laws and regulations. Please always refer to this section for the most recent version. The current version was last updated in September 2024.

Access and Contact Data

- For any inquiries or to exercise any of the rights mentioned in this privacy notice, please contact our Data Privacy Office at: DPO@bsfcapital.sa
- Saudi Fransi Capital, Closed Joint Stock Company, duly formed and organized under the laws of Kingdom of Saudi Arabia, with commercial registration number 1010231217, and principal office address at King Fahd Road 8092, P.O. Box 12313, Riyadh 3735, Kingdom of Saudi Arabia
- BSF Capital is under the control and supervision of the Capital Market Authority.

Acceptance

By accepting this privacy notice, you expressly consent to the Processing of your Personal Data for the provision of services and products, and to fulfill our contractual relationship.