

PRIVACY POLICY

VT Markets (Pty) Ltd – Dubai Branch

Capital Markets Authority (CMA) of United Arab Emirates

Licence no. 20200000299

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VT MARKETS (PTY) LTD – DUBAI BRANCH (“VT Markets (Dubai Branch),” “we,” “us,” or “our”) is committed to safeguarding your privacy and the confidentiality of your personal data. As an entity licensed by the Capital Markets Authority (CMA) **of the United Arab Emirates** to conduct **Category 5 regulated activities** as an Introducer and Promoter (License No. **20200000299**), we comply with applicable UAE laws, including **Federal Decree Law No. 45 of 2021 on Personal Data Protection (PDPL)**. This Privacy Policy explains how we collect, use, disclose, and protect your personal data when you interact with our website, digital platforms, or promotional activities.

1. We may collect, process, and store personal data to carry out our legitimate business and regulatory functions. Information we may collect includes:
 - **Contact information** such as name, email, phone number, and company details, typically provided when you complete forms, subscribe to updates, or engage with us online.
 - **Identification details** such as Emirates ID, passport number, nationality, and date of birth, collected only when voluntarily submitted, for example, to facilitate introductions to licensed financial institutions or verify investor eligibility.
 - **Submitted information** such as inquiry details, feedback, event registration data, or stated investment interests, used to tailor our communications and promotional content.
 - **Website and usage data** such as IP address, device identifiers, browser type, access times, and navigation activity, used for analytics and to improve user experience.
 - **Marketing preferences** such as your chosen communication method, consent status, and record of interactions, used to manage subscriptions in line with UAE consent requirements.
2. We do not intentionally collect sensitive personal data such as health, religion, biometrics, or political opinions. Please avoid submitting such information; if received inadvertently, we will delete it unless required by law.
3. Your personal data is processed for specific lawful purposes, including: responding to inquiries and providing information on licensed financial products, educational materials, or events; facilitating introductions to licensed third-party institutions strictly on a non-advisory basis; managing communications and maintaining accurate client records; conducting website analytics and improving user experience; and meeting legal and regulatory obligations, including KYC, AML, and audit requirements.
4. We do not provide investment advice, manage portfolios, execute trades, or hold client funds. We do not use your data for automated decision-making, profiling, or resale. All processing is transparent, proportionate, and conducted with your consent where required.

5. Our processing is based on lawful grounds:
 - **Consent** – such as when subscribing to marketing, submitting details via forms, or requesting introductions. Consent may be withdrawn at any time without affecting prior lawful processing, though it may limit our ability to provide services.
 - **Legitimate interests** – such as conducting promotional activities permitted by the CMA, enhancing user experience, maintaining communication records, and protecting our legal rights and website security. These are always balanced against your rights.
 - **Legal obligations** – such as maintaining compliance records, responding to regulators, or fulfilling statutory retention requirements under UAE law, including AML and CTF regulations.
6. We may disclose personal data only where necessary and in limited ways: to licensed financial institutions regulated by the CMA, Central Bank, or other competent authorities, strictly upon your request or consent; to authorized third-party service providers supporting marketing, analytics, IT, or hosting, under strict contractual safeguards; and to legal or regulatory authorities when required to comply with laws or official directives. We do not sell, rent, or trade your personal data.
7. In some circumstances, your data may be transferred outside the UAE, for example, to cloud providers, regulated institutions abroad, or technical support services. Where cross-border transfers occur, we ensure compliance with PDPL through adequacy assessments, contractual safeguards, and technical measures to protect your data.
8. We retain personal data only as long as necessary for the purposes described, or as required by UAE law and regulatory obligations. Retention periods vary depending on the type of data and service involved. Once data is no longer needed, it will be securely deleted, anonymized, or archived.
9. You may exercise rights under the PDPL, including the right to access your personal data, request correction, withdraw consent, request erasure (subject to legal exceptions), and object to processing based on legitimate interests. To exercise your rights, contact us at **compliance.mena@vtmarkets.com**. We may request proof of identity to verify requests and will respond within statutory timelines.

10. We use cookies and tracking technologies to enhance site performance, analyze usage, and remember user preferences. Cookie settings can be adjusted in your browser, though disabling certain features may affect site functionality.
11. We employ strong technical and organizational measures to protect personal data, including encryption, secure access controls, monitoring, and staff training. While no system is entirely risk-free, in the event of a data breach affecting your rights, we will notify you and the relevant authorities in accordance with UAE law.
12. Our website may link to third-party sites not controlled by us. This Privacy Policy applies only to our own data practices. We are not responsible for the privacy standards of external sites, and you should review their policies before sharing personal information.
13. By using our website or services, you confirm that you have read and understood this Privacy Policy and consent to the collection, use, and disclosure of your data as described. Continued use of our services after updates to this Policy constitutes acceptance of any changes.

We may revise this Privacy Policy periodically to reflect legal, regulatory, or operational changes. Updates will be posted on our website with the effective date clearly stated. You are encouraged to review the Policy regularly to stay informed about how we protect your personal data.