

## INTRODUCTION

### 1. Privacy Policy

This privacy policy applies to Wahed Securities Ltd. (“Wahed”) website at <https://www.wahedinvest.com> (the “Website”). This policy covers the collection, processing and other use and disclosure of personal data under the Data Protection Act 2017 (“DPA”) and the General Data Protection Regulation (“GDPR”). For the purpose of the DPA and GDPR we are the data controller and any enquiry regarding the collection or processing of your data should be addressed to The Director at our address Wahed Securities Ltd., Suite 1909, 19th Floor, Citadelle Mall, Sir Edgar Laurent Street, Port-Louis, Mauritius. For the purpose of this privacy policy, the terms “we”, “us” and “our” refer to Wahed. “You” refers to you as the user of the Website.

This privacy policy has been developed as an extension of our commitment to combine the highest-quality services with the highest level of integrity in dealing with all users of the Website. It is designed to assist you in understanding how we collect, use and safeguard personal information you provide to us and to assist you to make informed decisions. We will treat personal data that you provide through the Website according to this privacy policy, the DPA and the GDPR. This statement will be continuously assessed and updated against new technologies, business practices and our customers’ needs.

PLEASE REVIEW THIS PRIVACY POLICY CAREFULLY. By visiting and/or submitting information to or through this Website, you agree to be bound by the terms and consent to the collection, use, disclosure, retention and processing of your information as described in this privacy policy, the DPA and the GDPR.

### 2. Exclusion

You might find links to third party websites on our website. These websites should have their own privacy policies, which you should check. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

### 3. Amendments to the Privacy Policy

This Privacy Policy will come into effect on July 5, 2018 (the “Effective Date”). Although most changes are likely to be minor, we may change our privacy policy from time to time, to reflect changes to the Website, customer feedback and applicable law and in our sole discretion. If we decide to change our privacy policy, we will post those changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it. We encourage you to frequently check this page for any changes to the privacy policy. We will not make retroactive changes that reduce your privacy rights unless we are legally required to do so. Your continued use of the Website after any change in this privacy policy will constitute your acceptance of the amended privacy policy.

## INFORMATION WE COLLECT

### 4. Types of Information

We collect various kinds of information that you provide to us as well as information we obtain from your use of the Website. Some of the types of information that we collect include:

#### **“Personal Information”**

Information associated with or used to identify or contact a specific person. Personal Information includes: (1) contact data (such as name, address, postal address, e-mail address, telephone number and employer); (2) financial information (such as credit card number); (3) demographic data (such as gender, date of birth and zip code); and (4) certain Usage Data (defined below), such as IP address.

Certain personal information, such as information about personal health or racial or ethnic origins, is characterized as sensitive (“Sensitive Personal Information”) and subject to stricter regulation than other personal information. Before providing it to use, we urge you to carefully consider whether to disclose your Sensitive Personal Information to us. If you do provide Sensitive Personal Information to

us, you consent to its use and disclosure for the purposes and in the manner described in this privacy policy.

### **“Usage Data”**

Information about an individual's online activity that, by itself, does not identify the individual, such as:

- technical information, including your browser type, service provider, IP address, operating system and webpages visited;
- information about what you've searched for and looked at while using the Website; or
- metadata, which means information related to items you made available through the Website, such as the date, time or location that a shared photograph or video was taken or posted.

Generally, we do not consider Usage Data as Personal Information because Usage Data by itself usually does not identify an individual. Personal Information and Usage Data may be linked together. Different types of information also may be linked together and, once linked, may identify an individual person. Some Usage Data may be Personal Information under applicable law.

### **“Location Data”**

A category of Personal Information collected about the location of a mobile device or computer, including:

- the location of the mobile device or computer used to access the Website derived from GPS or WiFi use;
- the IP address of the mobile device or computer or internet service used to access the Website; and; and
- other information made available by a user or others that indicates the current or prior location of the user.

## **5. How We Collect Information**

Whether we collect certain types of information and how we process it depends on how you use and access the Website. Some information is collected automatically through use of cookies and similar data collection tools. We collect information about you in the following ways:

## **From You**

We collect information from you when you:

- Use our services. We collect Personal Information from you when you create an account to use one of our services, contact us for help or information or otherwise voluntarily provide your Personal Information.
- Connect with social media through the Website. The Website may offer you the ability to use Facebook Connect or other social media services (collectively, "Social Media") in conjunction with certain services. When you access the Website through your Facebook or other Social Media account, the Website may, depending on your privacy settings, have access to information that you have provided to the Social Media platform. We may use this information for the purposes described in section 6.

## **From Our Business Partners and Service Providers**

Third parties that assist us with our business operations also collect information (including Personal Information and Usage Data) about you through the Website and share it with us.

We may combine the information we collect from you with information from other sources and use the combined information as described in this privacy policy.

## **Usage Data**

We also automatically collect Usage Data when you interact with the Website.

## **From cookies and other data collection tools**

Our Website uses cookies. We use cookies to gather information about your computer for our services and to provide statistical information regarding the use of our Website. Such information will not identify you personally - it is statistical data about our visitors and their use of our Website. This statistical data does not identify any personal details whatsoever. We may also gather information about your general internet use by using a cookie file. Where used, these cookies are downloaded to your computer automatically. This

cookie file is stored on the hard drive of your computer, as cookies contain information that is transferred to your computer's hard drive. They help us to improve our Website and the service that we provide to you by tracking users' navigation habits and storing users' password, customizing users' experience with the Website; enabling us to analyze technical and navigational information; and helping to detect and prevent fraud.

We also use other cookies and other data collection tools (such as web beacons and server logs), which we collectively refer to as “data collection tools,” to help improve your experience with the Website. For example, data collection tools help us remember users and make the services more relevant to them.

The Website also may use data collection tools to collect information from the device used to access the Website, such as operating system type, browser type, domain and other system settings, as well as the operating system used and the country and time zone in which the computer or device is located.

Web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to manage and delete cookies, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). Some web browsers (including some mobile web browsers) provide settings that allow a user to reject cookies or to alert a user when a cookie is placed on the user's computer, tablet or mobile device. Most mobile devices also offer settings to reject mobile device identifiers.

All computers have the ability to decline cookies. This can be done by activating the setting on your browser which enables you to decline the cookies. Please note that should you choose to decline cookies, you may be unable to access particular parts of our Website.

## 6. How We Use Your Information

We may process the information we collect/you provide to us in accordance with the DPA and GDPR. This information is primarily used to enable us to provide our services to you. In addition, we may use the information for the following purposes:

- to operate, improve and personalize the products and services we offer, and to give each user a more consistent and personalized experience when interacting with us;
- for customer service, security, to detect fraud or illegal activities, or for archival and backup purposes in connection with the provision of services;
- to communicate with users and to notify them about any changes to our Website, such as improvements or service/product changes, that may affect our services;
- to better understand how users access and use the Website, for the purposes of trying to improve our services and to respond to user preferences, including language and location customization, personalized help and instructions, or other responses to users' usage of the Website;
- to help us develop our new products and services and improve our existing products and services;
- to provide users with advertising and direct marketing that is more relevant to you;
- to enforce any other applicable policies; and
- to assess the effectiveness of and improve advertising and other marketing and promotional activities on or in connection with the Website.

In order to provide you with a better experience and to improve the services, information collected through the Website may be used in an aggregated or individualized manner.

For example, personal information collected during use of one of the services may be used to suggest particular content that can be made available to the user on another service or be used to try to present more relevant advertising in another service.

## 7. How We Share and Disclose Your Information

We may share and disclose information as described at the time information is collected or as follows:

### **When you consent**

We may share Personal Information with third parties if you have given us your consent to do so or:

- in the event that we sell or buy any business or assets, in which case we may disclose your Personal Information to the prospective seller or buyer of such business or assets;
- if we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- if we are under a duty to disclose or share your Personal Information in order to comply with any legal obligation or in order to enforce or apply our Website Terms and other agreements, but we will endeavor to minimise such disclosure to only that reasonably necessary and, where possible, to provide you with notice of such disclosure; and/or
- to protect the rights, property, or safety of Wahed, the Website, our users and any third party we interact with to provide the Website.
- If you do not want us to use your data, you will have the opportunity to withhold your consent to this when you provide your details to us on the form on which we collect your data, or you can do so by writing to us at Wahed Securities Ltd., Suite 1909, 19th Floor, Citadelle Mall, Sir Edgar Laurent Street, Port-Louis, Mauritius, or sending us an email to [globalsupport@wahedinvest.com](mailto:globalsupport@wahedinvest.com).
- In the same manner, if you have given us consent to use your data for a particular purpose you can revoke or vary that consent at any time.

### **To perform services**

We may disclose Personal Information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries in order to perform services requested or functions initiated by users. In addition, we may disclose Personal Information in order to identify a user in connection with communications sent through the Website.

With third party service providers performing services on our behalf We share information, including Personal Information, with our service providers to perform the functions for which we engage them (such as hosting and data analyses). We may share information as needed to operate other related services.

### **For legal purposes**

We also may share information that we collect from users, as needed, to enforce our rights, protect our property or protect the rights, property or safety of others, or as needed to support external auditing, compliance and corporate governance functions. We will disclose Personal Information as we deem necessary to respond to a subpoena, regulation, binding order of a data protection agency, legal process, governmental request or other legal or regulatory process. We may also share Personal Information as required to pursue available remedies or limit damages we may sustain.

### **In aggregated form**

We may share Personal Information about you in an aggregated form that is, in a statistical or summary form that does not include any personal identifiers, with third parties in order to discover and reveal trends about how users like you interact with our services.

### **During corporate changes**

We may transfer information, including your Personal Information, in connection with a merger, sale, acquisition or other change of ownership or control by or of us or any affiliated company (in each case whether in whole or in part). When one of these events occurs, we will use reasonable efforts to notify users before your information is transferred or becomes subject to a different privacy policy.

## **8. Information Storage and Security**

We retain information for a period of seven (7) years. We also retain Personal Information from closed accounts to comply with applicable law, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigation and other actions permitted by law. After this period, we dispose of it according to our data retention and deletion policies.

The security of your Personal Information is important to us. We shall take all appropriate security and organizational measures to prevent unauthorized access to, alteration of, disclosure of, accidental loss, and destruction of personal information under our control. When you register on Wahed website, we use a secure server. The secure

server software (SSL) encrypts all information you input before it is sent to us. Furthermore, all of the sensitive data we collect is protected by several layers of encryption and several layers of security to prevent unauthorized access.

However, the security of information transmitted through the internet can never be guaranteed. We are not responsible for any interception or interruption of any communications through the internet or for changes to or losses of data. Users of the Website are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of any of our digital services. In order to protect you and your data, we may suspend your use of any of the services, without notice, pending an investigation, if any breach of security is suspected. Access to and use of password protected and/or secure areas of any of the services are restricted to authorized users only. Unauthorized access to such areas is prohibited and may lead to criminal prosecution.

## 9. Your Rights

The DPA and GDPR give you the right and it is also important to us that you are able to access, review and request copy of the Personal information held about you by us. You are also entitled to have incorrect Personal Information about you corrected and you may in some cases ask us to restrict our processing in certain circumstances or delete your Personal Information. Please write to us or contact us by email if you wish to request confirmation of what personal information we hold relating to you. You can write to us at Wahed Securities Ltd., Suite 1909, 19th Floor, Citadelle Mall, Sir Edgar Laurent Street, Port-Louis, Mauritius or by email to [globalsupport@wahedinvest.com](mailto:globalsupport@wahedinvest.com). There is no charge for requesting that we provide you with details of the personal data that we hold. We will provide this information within 30 days of your requesting the data.

You also have the right to change the permissions that you have given us in relation to how we may use your data. You also have the right to request that we cease using your data or that we delete all

personal data records that we hold relating to you. You can exercise these rights at any time by writing to us at the addresses detailed above.

The GDPR and DPA also give you right to lodge a complaint with a supervisory authority, in particular in the state where you work, normally live or where any alleged infringement of data protection laws occurred if you consider that the processing of your Personal Data infringes these regulations.

## 10. Links to Third Party Websites and Services

The Services may contain links to third-party websites and services with which we have no affiliation. A link to any other website does not mean that we guarantee, approve or endorse the information or products available or the quality or accuracy of information presented on it.

We do not operate or control and have no responsibility for the information, products and/or services found on any external websites, unless expressly stated on such external website. Nor do such links represent or endorse the accuracy or reliability of any information, products and/or services provided on or through any external websites, including, without limitation, warranties of any kind, either express or implied, warranties of title or non-infringement or implied warranties of merchantability or fitness for a particular purpose. You assume complete responsibility and risk in your use of any external sites.

If you decide to visit a third party website, you are subject to its privacy policy and practices and not this privacy policy. We encourage you to carefully review the legal and privacy notices of all other digital services that you visit.

We welcome any queries, comments or requests you may have regarding this Privacy Policy. Please do not hesitate to contact us at Wahed Securities Ltd., Suite 1909, 19th Floor, Citadelle Mall, Sir Edgar Laurent Street, Port-Louis, Mauritius or [globalsupport@wahedinvest.com](mailto:globalsupport@wahedinvest.com).

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