



Notification letter to the individual clients of investment intermediary Emirates Wealth EAD regarding the processing of personal data

This notification letter will be provided to the clients of the investment intermediary by virtue of Article 13, Paragraph 1 and 2 from Regulation 2016/679 and discloses information that concerns the processing of personal data.

1. Emirates Wealth EAD is sole owned joint stock company, instituted according to Commercial law and recorded in the Commercial register of the Registry Agency with Unified Identification Code (UIC) 175249529, LEI code: 5493003WF68RBY8JPY23, GIIN: 0EVXET.99999.SL.100, with headquarters in the city of Sofia, postal code 1303, “Vuzrazhdane” district, 84-86 “Aleksandar Stambolyiski” Blvd., 4th floor, office 18, phone number 02/401 26 36. The company was authorized to operate as an investment intermediary by virtue of license № RG-03-0220 issued by the Financial Supervision Commission. Contact person for the investment intermediary Emirates Wealth EAD is Mr. Sasho Georgiev Petrov, member of the BoD and chief executive officer, email for contact purposes: office@emirateswealth.bg, to which one may bring an appeal or a signal regarding the processing of personal data;
2. The purposes of processing personal data are related to the identification procedures aimed at the clients of the company and its counterparties, assessment of a certain service (suitability and appropriateness), as well as satisfaction of the regulatory requirements established in the Measures against Money Laundering Act and the Measures against Terrorist Financing Act;

The company has the right and obligation to process the personal data of its clients for the purposes established in the Markets in Financial Instruments Act, the Measures against Money Laundering Act, the Tax-Insurance Procedure Code, the acts which implement them as well as other directly applicable regulations of the European Commission, which regulate its activities or regulations applicable in the Republic of Bulgaria. In the quoted laws and regulations, obligations of the company which acts as a data administrator are established. Their preservation is obligatory for the purposes of carrying on an activity as a provider of investment and additional services, including by the means of processing and retention of personal data.

3. The receiver of personal data are the authorities established in the Article 91 of the Markets in Financial Instruments Act and under the circumstances quoted in the already mentioned provision of MFIA. The processing of personal data is being carried out by the employees of the investment intermediary. It is permissible for legal advisors, lawyers, accountants, auditors, risk managers, technical specialists responsible for the maintenance of the computer systems of the company, as well as providers of informational services for the corresponding activities carried out by the persons involved in the already designated categories, to have access to the personal data.

With the client's consent the investment intermediary can disclose and provide the personal data to its partners or financial services providers. By receiving this notification letter the client gives his approval for providing of his personal data to third parties, partners of the investment intermediary for the purposes of the provided services for direct marketing and statistical processing of data.

By signing this notification letter the client is regarded explicitly as informed about the necessity and the legal requirement upon the investment intermediary to allocate/provide personal data of the client to brokers licensed in third countries for the purpose of providing some investment services and activities by such brokers. Without this data allocation the contractual obligations related to the execution and/or the reception and transmission of orders for transactions in financial instruments cannot be fulfilled.

4. In its capacity as personal data administrator the investment intermediary does not have the intention to submit/transfer personal data to a third country or international organization unless the Client has given its consent..
5. The investment intermediary shall keep all the documents, data and information collected and prepared in line with the Measures against Money Laundering Act and the regulation for its implementation, the Markets in Financial Instruments Act and the directly applicable regulations for a period of five years. In the case of establishing business relations with clients, as well as in the cases of entering in correspondent relations the period for personal data keeping starts from the beginning of the calendar year, the year after the event of the termination of the relationship. The criteria for the time limit is referred to in the Article 67 from the Measures against Money Laundering Act.
6. The client has the right to require from the investment intermediary access to or correction of the personal data. However, deleting personal data or setting limitations to its processing is possible only after the expiry of the legal deadline for the record keeping. The client has the right to appeal against the processing of personal data, as well as against the data portability right, provided that this does not contradict to a statutory duty of the investment intermediary or other legal acts of the European Union.

7. When the processing of personal data is based on provided consent, the client has the right to revoke his/her consent at any given time without prejudice to the legality of the processing based on consent before the revocation.
8. The client has the right to bring an appeal to supervisory authority regarding the processing of his/her personal data. The personal data subject, whose data is being collected and processed by the investment intermediary can bring such appeal to the Commission for personal data protection stationed on the following address: city of Sofia, postal code 1592, "Prof. Tsvetan Lazarov" Str. № 2, phone number: 02/91-53-518, opening hours: 9:00-17:30.
9. The provision of personal data is a legal, mandatory requirement according to the Markets in Financial Instruments Act, the Measures against Money Laundering Act, the Tax-Insurance Procedure Code, directly applicable regulations of the European Commission, legal regulations of the Financial Service Commission, rules of the European Securities and Markets Authority (ESMA), European Banking Authority (EBA) and ordinances issued by the Financial Supervision Commission. The personal data subjects, whose data is being collected and processed by the company are regarded as informed about this fact by the means of written paragraphs in the General conditions or the contracts signed with clients and/or counterparties and about the fact that their refusal to provide the personal data, which is required according to Markets in Financial Instruments Act and the Measures against Money Laundering Act/the Regulation for implementing the Measures against Money Laundering Act is a legal basis for the company to refuse the provision of the respected service.

Consequences from the refusal to provide personal data: In the cases in which the investment intermediary is unable to fulfill the requirements established in the Measures against Money Laundering Act due to the client's refusal to submit personal data, the intermediary is obliged to refuse the execution of the operation or the deal or entering in business relations, including opening an account (Article 17, Paragraph 1 from the Measures against Money Laundering Act).

10. The investment intermediary does not implement automated decision-making, including profiling and based on this it does not provide information about the use of logic, as well as the meaning and the projected impact of the processing on the subject of the data.

By receiving this letter, the client declares that he/she understands the content and the consequences the Privacy Policy and this letter and accepts them.

Date 25 May 2018