



## Types of personal data processed

For the purposes of the rules on personal data protection and according to the requirements of the Regulation 2016/679 the company in its capacity as a personal data administrator, the investment intermediary processes the following personal data of its employees and clients/counterparties.

The enumeration contains the exact data and the legal basis for its processing.

This attachment is being presented to the clients of the company in order for them to get acquainted with the data for which processing a statutory obligation has been laid down for the company.

### **I. Personal data processed according to the requirements of the Measures against Money Laundering Act and the Regulation for implementing the Measures against Money Laundering Act**

1. Names of the client; [Article 53, subparagraph 2, point 1 from the Measures against Money Laundering Act; Article 2, subparagraph 3, point 1 from the Regulation for implementing the Measures against Money Laundering Act;]
2. Date of birth; [Article 53, subparagraph 2, point 2 from the Measures against Money Laundering Act; Article 2, subparagraph 3, point 2 from the Regulation for implementing the Measures against Money Laundering Act;]
3. Place of birth; [Article 53, subparagraph 2, point 2 from the Measures against Money Laundering Act; Article 2, subparagraph 3, point 2 from the Regulation for implementing the Measures against Money Laundering Act;]
4. PIN (official personal identification number or other unique element for the purpose of identity verification); [Article 53, subparagraph 2, point 3 from the Measures against Money Laundering Act; Article 2, subparagraph 3, point 3 from the Regulation for implementing the Measures against Money Laundering Act;]
5. Tax insurance number (if applicable); [Tax-Insurance Procedure Code]
6. Every citizenship the person holds including if he/she holds more than one or has a green card; [Article 53, subparagraph 2, point 4 from the Measures against Money Laundering Act; Article 2, subparagraph 3, point 4 from the Regulation for implementing the Measures against Money Laundering Act;]

7. Country of permanent residence; [Article 53, subparagraph 2, point 5 from the Measures against Money Laundering Act; Article 2, subparagraph 3, point 5 from the Regulation for implementing the Measures against Money Laundering Act;]
8. Country/countries in which the person is being considered as tax resident; [Tax-Insurance Procedure Code]
9. Address; [Article 53, subparagraph 2, point 5 from the Measures against Money Laundering Act; Article 2, subparagraph 3, point 5 from the Regulation for implementing the Measures against Money Laundering Act; Tax-Insurance Procedure Code;]
10. Type of the identity document; [Article 53, subparagraph 2 from the Measures against Money Laundering Act]
11. Number of the identity document; [Article 53, subparagraph 2 from the Measures against Money Laundering Act]
12. Issuer of the identity document; [Article 53, subparagraph 2 from the Measures against Money Laundering Act]
13. Validity; [Article 53, subparagraph 2 from the Measures against Money Laundering Act and Article 2, subparagraph 3, point 3 from the Regulation for implementing the Measures against Money Laundering Act;]
14. Photograph; [Article 53, subparagraph 2, point 3 from the Measures against Money Laundering Act; Article 2, subparagraph 3, point 3 from the Regulation for implementing the Measures against Money Laundering Act;]
15. Certified and signed true copy of the official identity document of the client with date (Article 53, subparagraph 1 and Regulation №38 for the requirements applicable to the activities of the investment intermediaries passed by Financial Supervision Commission;
16. Correspondence address [Article 2, subparagraph 4, point 1 from the Regulation for implementing the Measures against Money Laundering Act;]
17. Telephone, fax and email address [Article 2, subparagraph 4, point 2 from the Regulation for implementing the Measures against Money Laundering Act;]
18. Profession [Article 2, subparagraph 4, point 3 from the Regulation for implementing the Measures against Money Laundering Act;]
19. Position held [Article 2, subparagraph 4, point 4 from the Regulation for implementing the Measures against Money Laundering Act;]
20. Employer [Article 2, subparagraph 4, point 5 from the Regulation for implementing the Measures against Money Laundering Act;]

21. Other official valid identity documents containing photograph of the face for the purpose of completing missing data [Article 53, subparagraph 5 from the Measures against Money Laundering Act].

22. Data for the real owner of legal persons [Article 59 from the Measures against Money Laundering Act];

23. Information from the client on his main activity, including the real and expected volume of the business relations and the operations or deals which are expected to be executed in the framework of these relations with the help of completing questionnaires or other suitable manner [Article 66, subparagraph 1 from the Measures against Money Laundering Act];

24. Data related to the categorization of the client as a politically exposed person [Article 36 from the Measures against Money Laundering Act];

**Consequences from the refusal to provide personal data:** In the cases in which the investment intermediary is unable to fulfill the requirements for thorough due diligence established in the Measures against Money Laundering Act, 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).

**Time period for personal data preservation:** The investment intermediary preserves all the documents, data and information collected and prepared in line with the Measures against Money Laundering Act and the regulation for his 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 preservation starts from the beginning of the calendar year, the year after the event of the termination of the relationship [Article 67 from the Measures against Money Laundering Act];

## **II. Personal data processed according to the requirements of Regulation 38 for the requirements applicable to the activities of the investment intermediaries**

1. Bank statement which indicates that the client is the holder of the relevant bank account;

2. Notary verified signature of the client under the contract for investment intermediation;

3. Document which certifies paid utility bills like electricity or water;

4. Notary certified power of attorney from the client to his authorized agent for the execution of management and/or operational activities with financial instruments.

## **III. Personal data processed according to the requirements of the Markets in Financial Instruments Act and delegated Regulation (European Union) 2017/565 regarding the organizational requirements and conditions applicable to the activities of the investment intermediaries.**

1. Experience and knowledge of the client about the inherent risks connected with the offered or required investment product or investment service (Article 56 from Regulation 2017/565);
2. Educational level and profession or previous profession of interest of the client or the potential client (Article 55, paragraph 1, letter “c” from Regulation 2017/565);
3. Types of services, deals and financial instruments which the client is acquainted with (Article 55, paragraph 1, letter “b” from Regulation 2017/565);
4. Nature, volume and frequency of the deals with financial instruments executed by the client and the period they have been executed within (Article 55, paragraph 1, letter “b” from Regulation 2017/565);
5. Financial status of the client – it includes the source and amount of his/her regular income, assets, including liquid assets, investments and real estates as well as his regular financial obligations (Article 54, paragraph 4 from Regulation 2017/565);
6. Investment purposes of the client or the potential client – it includes information on the length of time for which the client wishes to hold the investment, his preferences regarding risk taking, his risk profile, and the purposes of the investment (Article 54, paragraph 5 from Regulation 2017/565);
7. Information on the IP address and the email of the client (Article 3, paragraph 3 from the delegated Regulation (European Union) 2017/565);
8. The information preserved by the investment intermediary on the transactions with financial instruments executed on behalf of the client should include as minimum data about the client’s identity and the actions taken in pursuant to the Measures against Money Laundering Act and the Measures against Terrorist Financing Act (Article 85, subparagraph 2 from the Markets in Financial Instruments Act).
9. Register of the telephone conversations with clients (Article 65, subparagraph 1 from the Markets in Financial Instruments Act and article 76 from the delegated Regulation (European Union) 2017/565).

*The processed information is statutory, and it is an obligation of the investment intermediary to collect it due to assessment of relevance and expediency as well as determination of the risk profile of the client.*

#### **IV. Personal data collected according to the requirements of the Article 142 from the Tax-Insurance Procedure Code**

When initiating procedure of opening an account through declaration by the holder of the account, the investment intermediary collects data which allows it to implement the procedures for thorough due diligence and to determine whether the holder of the account is a person for whom information has been provided as follows:

1. regarding financial account which holder is a natural person:

a) name;

b) home address;

c) date and place of birth;

d) every jurisdiction in which the person is being considered as tax resident;

e) tax insurance number for every jurisdiction in which the person is being considered as tax resident;

f) every citizenship the person holds;

g) notification obligation if changes in circumstances take place;

h) responsibility in the case of misreporting;

i) confirmation of notification that the information can be subject to automatic exchange of financial information;

j) date and signature of the person.

**V. Personal data collected according to the Labor code from the employees of the investment intermediary**

With the permission of the person: address, three names, PIN, copy of the ID card, telephone number, email, information on bank account, educational level. With the permission of the employee information on his/her criminal record is collected. The employee explicitly provides data about his/her health status (such data may not be provided if the employee discloses that he/she doesn't suffer from physical illness which prevents him/her from carrying out his/her activities in the investment intermediary Emirates Wealth EAD).

