



# **DBG MARKETS' PRIVACY POLICY ("Policy")**



We value your privacy and are committed to safeguarding and respecting your personal data. This Privacy Policy outlines the types of personal data we collect when you choose to use our services, how we utilize your personal data, and the measures we take to ensure its security. It is important that you carefully read and understand this Policy, along with our Terms and Conditions of Service and any other referenced documents, as they establish the basis on which we process the personal data we collect from you or that you provide to us. All personal data in our possession is subject to this Policy.

By using our websites or Apps, applying for an account, or providing us with information, you acknowledge that you comprehend how we collect, use, and disclose your personal data in accordance with this Privacy Policy. If you do not agree with this Privacy Policy, please refrain from using our services. Throughout this document, the term "DBG Markets" "we," or "us" refers to the owner of the website. The term "you" or "your" refers to the user or viewer of our website. This Privacy Policy outlines how we handle the personal information you provide to us or that we collect from your use of our services and/or website. Should you have any inquiries regarding this Privacy Policy, kindly reach out to our Data Protection Officer (DPO), who is responsible for addressing any inquiries or concerns regarding this Privacy Policy using the contact information provided below:

Attention: Data Protection Officer  
Email: [compliance@dbgm.com](mailto:compliance@dbgm.com)

This Policy may be changed, amended and updated from time to time. Shall we materially change the Policy in regard to how we collect, process or use your personal information, the revised Policy will be uploaded to our website.

For any inquiries or requests regarding your personal data or concerns about this notice, please direct your communication to the physical address of the firm.

Typically, we acquire your information through various channels, including your utilization of our services with us, which includes our website, applications, webinar sign-up forms and subscription to news updates. This can include your personal details such name, surname, address and contact details, date and place of birth, email address, residential address, profession, employment details and your current financial situation including details about your income, assets and liabilities, trading performance and statements and other related information. Where necessary, we also collect information on the following individuals: (a) company directors, officers, partners and trustees; (b) a client's agents; (c) beneficial owners of a client. We may be required under the applicable laws to sight and record details of certain documents and we may take steps to verify the information we collect.

All communications between you and us will be recorded, as permitted by applicable laws. This includes electronic communications, telephone conversations, in-person interactions, and any other form of communication. Please be aware that telephone calls may be recorded without prior notice for evidence and quality assurance purposes.



**A. RECORDS OR PERSONAL DATA THAT MAY BE RETAINED BY US**

Operations	<p>Brochures and Company Information</p> <p>Client and Customer Registry</p> <p>Contracts</p> <p>General Correspondence</p> <p>Information relating to Work-In-Progress</p> <p>Marketing material and Future Strategies</p> <p>Policies and Procedures</p>
Financial Records	<ul style="list-style-type: none"> <li>- Accounting Records</li> <li>- Annual Financial Statements</li> <li>- Asset Register</li> <li>- Banking Records</li> <li>- Contracts</li> <li>- Financial Transactions</li> <li>- General Correspondence</li> <li>- Insurance Information</li> <li>- Management Accounts</li> <li>- Tax Records (Company and Employee)</li> </ul>
Information Technology	<ul style="list-style-type: none"> <li>- IT policies and Procedures</li> </ul>
Special information processed	<ul style="list-style-type: none"> <li>- Offences / alleged offences</li> <li>- Criminal proceedings, outcomes &amp; sentences</li> </ul>
Possible Recipients of Personal Information	<ul style="list-style-type: none"> <li>- Banks and other financial institutions.</li> <li>- Ombudsman and regulatory authorities</li> <li>- Regulatory, statutory and government bodies</li> <li>- Third party verification agencies and credit bureau</li> </ul>

Categories of Data Subjects	Personal Information that may be processed
Natural Persons - Clients/customers/financial planners - Representatives/Agents - Contractors	<ul style="list-style-type: none"> <li>- Names</li> <li>- Physical and postal addresses</li> <li>- Date of birth</li> <li>- ID number</li> <li>- Tax related information</li> <li>- Nationality</li> <li>- Gender</li> <li>- Confidential correspondence</li> <li>- Email address</li> <li>- Telephone number</li> </ul>
Service Providers	names, registration number, vat numbers, address and bank details
Employees - Existing and former employees - Contractors, agents, temporary and casual employees	name, address, qualifications, registration numbers or identity numbers, bank details, tax related information, nationality, confidential correspondence, email address, contact telephone numbers
Juristic Persons	<ul style="list-style-type: none"> <li>- Names of contact persons</li> <li>- Name of Legal Entity</li> <li>- Registration Number</li> <li>- Physical and Postal address and contact details</li> <li>- Founding documents</li> <li>- Tax related information</li> <li>- Authorised signatories, beneficiaries, ultimate beneficial owners</li> </ul>



## **B. INCOMPLETE OR INACCURATE INFORMATION**

If you provide us with incomplete or inaccurate information, we may not be able to fulfill your requests for our services. It is important to provide us with accurate and complete information. You can update your contact details at any time by sending a request via email to [support@dbgm.com](mailto:support@dbgm.com).

## **C. SAFEGUARD YOUR PERSONAL DATA**

We consistently implement suitable technical and organizational measures to uphold the security of your information. Specifically, we provide training to our employees who handle personal data to ensure they understand the importance of maintaining customer confidentiality and respecting individual privacy. Any violations of your privacy are treated with utmost seriousness, and appropriate penalties, including dismissal if necessary, are enforced.

Measures include:

- Acceptable usage of personal information
- Access control to personal information
- Computer and network security including Firewalls, Virus protection software and update protocols
- Governance and regulatory compliance
- Internal process to report security breach or anticipated security breach
- Investigating and reacting to security incidents.
- Logical and physical access control
- Monitoring access and usage of private information
- Physical security
- Retention and disposal of information
- Secure communications
- Security in the outsourcing of any activities or functions through appropriate contracts
- Training of staff members



We continuously establish and maintain appropriate, reasonable technical and organisational measures to ensure that the integrity of the Personal Information which may be in our possession or under our control, is secure and that such information is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration or access by having regard to the requirements set forth in law, in industry practice and generally accepted information security practices and procedures applicable.

#### **D. PROCESSING OF PERSONAL INFORMATION**

Processing is carried out with the consent of the data subject and the Company is fully compliant with the applicable data protection law and has invested resources to ensure that the Employees and/or Contractors understand how to handle a client's personal information. All Employees and/or Contractors must follow the following guidelines when dealing with data subject's personal information:

- a. The personal information requested must only be used for lawful purposes;
- b. The personal information must be processed for a purpose which is adequate, relevant and not excessive;
- c. The personal information may only be collected with the data subject's consent. The burden of proof rests with the Employees and/or Contractors, to prove that the information was obtained with the data subject's consent.
- d. Company and Employees and/or Contractors may only collect personal information that is necessary for a specific purpose;
- e. Personal information must not be retained longer than necessary, except if it is required by law or is for a lawful purpose related to the Company's functions or activities or it is agreed upon in terms of contractual agreement; and
- f. The personal information in the Company's records should be updated as and when the data subject provides new or updated personal information.

#### **E. TRANSFERS OF YOUR PERSONAL DATA**

We may transfer your personal information to other DBG Group companies and processors located outside the Anguilla. This may include companies of the DBG Group in Singapore, Australia, South Africa. When we transfer your information outside of Anguilla, we will ensure that the transfer is done in a lawful manner and that appropriate security arrangements are in place to protect your data.



## **F. DATA RETENTION**

We will retain your personal data only for the duration of your consent or for as long as it is necessary for us to provide our services and fulfill the purposes for which the data was collected. This includes meeting any legal, accounting, reporting, or regulatory requirements. For example, the regulator may require us to keep basic client information, such as contact, identity, financial, and transaction data, for up to six years after the client relationship ends.

Should you desire, you have the option to request the deletion of your personal data. To initiate this process, kindly send a deletion request via email to [support.al@dbgm.com](mailto:support.al@dbgm.com)

When we determine that certain personal data is no longer needed, we ensure its effective and secure destruction.

## **G. THE DATA SUBJECT'S RIGHT TO ACCESS TO PERSONAL INFORMATION**

The owner of personal information can request us to provide them with the record, or a description of the personal information, the identity of any third party who may have access or had access to their personal information.

Data subject requesting the abovementioned access to information shall submit the request to us in form set out below:

### **Application form to request access to a record of personal information held by the Company:**

A. Particulars of person requesting access to the record:

Full Names and Surname: \_\_\_\_\_

Identity Number: \_\_\_\_\_

Postal Address: \_\_\_\_\_

Telephone Number: (\_\_\_\_) \_\_\_\_\_ Fax Number: (\_\_\_\_) \_\_\_\_\_

Email Address: \_\_\_\_\_

Capacity in which request is made when made on behalf of another person:



B. Particulars of person on whose behalf request is made: (This section must only be completed if a request for information is made on behalf of another person):

Full Names and Surname: \_\_\_\_\_

Identity Number: \_\_\_\_\_

C. Particulars of record (provide full details of the record to which access is requested):

Description of record or portion of the record requested:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

D. Reference Number/ Heading (if Applicable):

\_\_\_\_\_  
\_\_\_\_\_

E. Any further particulars of record:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signed at \_\_\_\_\_, this day \_\_\_\_ of \_\_\_\_\_ year \_\_\_\_\_.

\_\_\_\_\_

SIGNATURE OF REQUESTER / PERSON ON WHOSE BEHALF REQUEST IS MADE





REQUEST RECEIVED FROM: \_\_\_\_\_

ACTING ON BEHALF OF: (if Applicable) \_\_\_\_\_

\_\_\_\_\_

SIGNATURE OF INFORMATION OFFICER OF THE COMPANY:

#### **H. FORBIDDEN USES OF DATA SUBJECT'S PERSONAL INFORMATION**

The employee or contractor may not use the Company's access to any data subject's personal information for personal gain on any such purposes as soliciting or proselytising for commercial ventures, religious or personal causes or outside organisations or other similar, non-job-related solicitations. If the Company discovers that any employee or contractor misusing the information available in the Company's systems, that employee and/or contractor will be subject to disciplinary action, which may include dismissal.

Should an employee or contractor be suspected of contravening this Policy, the Company may at its sole discretion access any device which the employee or contractor uses to conduct business to investigate the matter further.