



PRIVACY POLICY

Effective Date: 15/01/2025

Last Updated: 08/10/2025

This Privacy Policy explains how Finternum Holding Limited (“Finternum”, “we”, “our”, “us”) collects, uses, discloses, and protects personal data in connection with your use of our website www.finternum.com and related corporate communications (the “Website”).

Finternum is a company incorporated in the Dubai International Financial Centre (DIFC) under the laws of the United Arab Emirates, licensed to operate as a Holding Company and Managing Office. As such, Finternum does not provide financial, consumer, or regulated services through this Website. The Website is intended solely for corporate information and communication purposes.

By visiting or using this Website, you acknowledge and agree to this Privacy Policy.

1. Purpose and Scope

This Privacy Policy applies to personal data collected via our Website or through corporate communications (such as contact forms, email, or business correspondence). It does not apply to data processed by our subsidiaries or affiliates for their own business operations.

2. Data Controller

Finternum Holding Limited acts as the Data Controller under the DIFC Data Protection Law No. 5 of 2020 (as amended).

Registered Address: Level 01, Unit IH-00-01-01-OF-01, Innovation One, Dubai, UAE, PO Box 74777

Contact Email: info@finternum.com

3. Personal Data We Collect

We collect and process only minimal personal data, limited to what is necessary for our legitimate corporate and administrative purposes. This may include:

- * Contact details: name, business email address, phone number, company name, job title.
- * Communication data: information you provide through our contact form, or when you communicate with us by email or otherwise.
- * Website usage data: IP address, browser type, pages visited, time spent (via cookies and analytics tools, as described below).

* Supplier and partner information: limited business contact data necessary for contractual communication and due diligence.

We do not intentionally collect or process any “special category” or sensitive personal data (e.g. health, biometric, political, or religious data).

4. Purpose of Processing

We process personal data solely for the following limited purposes:

- * Corporate communications - to respond to legitimate business or partnership inquiries;
- * Website maintenance and improvement - to ensure functionality, security, and usability;
- * Administrative and compliance purposes - to meet DIFC legal or corporate governance requirements;
- * Business relations - to communicate with group companies, shareholders, suppliers, consultants, or advisors;
- * Security monitoring - to detect or prevent unauthorized access, fraud, or misuse of our Website.

5. Legal Basis for Processing

Under DIFC Data Protection Law, we rely on one or more of the following lawful bases:

- * Legitimate interests (corporate communications, website functionality, administration);
- * Legal obligations (compliance with DIFC, UAE, or group regulatory requirements);
- * Consent, where expressly provided (e.g. when subscribing to updates or contacting us voluntarily).

We do not engage in automated decision-making or profiling.

6. Data Sharing

We may share personal data on a limited basis with:

- * Service providers - IT hosting, website maintenance, and email providers under strict confidentiality;
- * Affiliated entities - within the Finternum group for administrative or governance purposes;
- * Professional advisors - legal, accounting, or compliance consultants, under confidentiality;



* Regulatory authorities - only if required by DIFC or UAE law.

We do not sell or trade personal data to third parties.

7. International Data Transfers

Where data is transferred outside the DIFC (for example, to group entities or service providers in other jurisdictions), such transfers are carried out in accordance with Articles 26–27 of the DIFC Data Protection Law, using appropriate safeguards (e.g. contractual clauses ensuring equivalent protection).

8. Data Retention

We retain personal data only for as long as necessary for the purposes described above, or as required by applicable law. When data is no longer needed, it is securely deleted or anonymized.

9. Data Security

We implement appropriate technical and organizational measures to protect personal data from unauthorized access, alteration, or destruction. These measures include:

- * Access controls and encryption;
- * Secure hosting within reputable infrastructure providers;
- * Regular software and security updates;
- * Staff confidentiality undertakings.

Despite these measures, no system is completely secure; use of the Internet involves inherent risks.

10. Your Rights

Under the DIFC Data Protection Law, you have the following rights (subject to legal conditions):

- * Access to your personal data;
- * Rectification of inaccurate data;
- * Erasure (“right to be forgotten”);
- * Restriction or objection to processing;
- * Data portability (where applicable);
- * Right to lodge a complaint with the DIFC Commissioner of Data Protection.

Requests may be submitted to info@finternum.com. We will respond within the timeframe prescribed by law.



11. Cookies

Our Website uses cookies solely to ensure technical functionality and collect anonymized analytics data (e.g. Google Analytics). You may disable cookies in your browser, although some features may not work correctly.

We do not use cookies for targeted advertising, remarketing, or behavioral profiling.

12. Children's Data

The Website is intended for adult visitors for corporate informational purposes. We do not knowingly collect personal data from individuals under 18.

13. Updates to This Policy

We may update this Privacy Policy from time to time. The latest version will always be available at www.finternum.com/privacy. Material changes will be clearly indicated with an updated "Effective Date".

14. Contact

For all privacy-related inquiries:

Finternum Holding Limited

Level 01, Unit IH-00-01-01-OF-01, Innovation One, Dubai, UAE PO Box 74777 Email: info@finternum.com