

Privacy Policy

Al Hilal Securities Advisors (Private) Limited

This privacy policy ("Policy") explains our policy regarding the collection, use, disclosure and transfer of your information by Al Hilal Securities Advisors (Private) Limited or any of its affiliate(s) ("we" or "us" or "our"), which operates the website <https://hilalinvest.com/> ("Site"), "Hilal Invest App" (the "App") available on Google Play Store, and other similar platforms and other services including but not limited to investing in mutual funds, communicating dues/balances via the site and application, any mobile or internet connected device or otherwise (collectively the "Hilal Invest App Service"). This Policy forms part and parcel of the Terms of Use for the Hilal Invest App Services. Capitalized terms which have been used here but are undefined shall have the same meaning as attributed to them in the Terms of Use. Users (as defined hereinafter) are requested to read this Policy in conjunction with the Terms of Use. The App/Site () provides investments in Collective Investments Schemes through registered Asset Management Companies, investment in listed equities through registered TREC holders of Pakistan

Stock Exchange, and acquisition of Takaful Policies through SECP registered Takaful Operators (collectively, "Services"). Please note that 'Services' would include any other future services we may provide or propose to provide. As we update, improve and expand the Hilal Invest App Service, this Policy may change, so please refer back to it periodically. By accessing the Site, App or otherwise using the Hilal Invest Services, you consent to collection, storage, and use of personal information you provide (including any changes thereto as provided by you) for any of the services that we offer. We respect the privacy of users of Hilal Invest App Services ("Users" or "you") and are committed to reasonably protecting it in all respects. The information about the User as collected by us is: (a) information supplied by Users and (b) information automatically tracked while using a mobile device / handheld divide or any other electronic device having Hilal Invest App Services enabled (collectively referred to as "Information"). By using Hilal Invest App Services, you agree to this Policy. If you do not agree with any of the terms in this Policy, please do not use / avail the Hilal Invest App Services.

Information supplied by users

To avail certain Services on the Hilal Invest App, Users are required to provide certain personal information for registration process which may include: a) their name, b) email address, c) phone number, d) business entity information, e) bank account/IBAN f) CNIC number of the Users, g) KYC details and any other such information as required. The Information as supplied by the Users enables us to provide the Services and improve the

Hilal Invest App Services and provide you with a user-friendly experience. In some cases, / provision of certain service(s) or utility (ies), we may require your contact address as well. In an attempt to improve our Services, we may, from time to time, collect any information (other than what is mentioned above) from Users through App/Site. You may be assured that we do not share this data with any third party except our partner organization where you intended to



invest through your consent in accordance with the terms of this Policy, we may access a user's inventory of installed apps and treat this data as personal or sensitive data subject to this Policy, secure transmission, and prominent disclosure requirements of the User. All Information is service-dependent and we may use the Information to provide the Services, maintain, protect, and improve the Hilal Invest App Services, and for developing new services. We may also use your email address and phone number without further consent for marketing, non-marketing or administrative purposes (such as notifying you of major changes, for customer service purposes, providing information about updates to Hilal Invest App Services, billing, etc.). Any Information provided by you will not be considered personal information if it is freely available and/or accessible in the public domain or is not deemed as a piece of personal information under the applicable law. Further, any reviews, comments, messages, or blogs posted/uploaded/conveyed/communicated by Users on the public sections of the Site or an application store (like the App Store or Play Store) becomes published content and are not considered personal information which is subject to this Policy. In case you choose to decline to submit Information on the Hilal Invest App/Site, we may not be able to provide certain services on the App/Site to you. We will make reasonable efforts to notify you of the same at the appropriate time. In any case, we will not be liable and or responsible for the denial of certain services to you due to not receiving necessary Information from you. When you register with the Hilal Invest App Services, we may (at our discretion) contact you from time to time about the updation of your information. Information is automatically tracked while using the App or Site

Investments/transactions history: We store all your investments/ transactions records in a cloud-based environment using the services of third-party infrastructure service providers. We may reference other sources of demographic and other information to provide you with more targeted communications and promotions. We use Google Analytics, among others, to track the User behavior on Site. **Log File Information:** Our Servers automatically collect limited Information about your device's connection to the internet, including your IP address, when you visit our Site or use the App. We automatically receive and log Information from the App and/or your browser including but not limited to IP address, your device or computer's name, and your operating system, We may also collect log Information from your device, including but not limited to your location, IP address, your device's name, device's serial number or unique identification number (e.g. UDID on your iOs device, Android ID or ADID on your Android Device), your device operating system, browser type and version, CPU speed, and connection speed etc. **Cookies:** To improve the responsiveness of the Site for our Users, we may use "cookies", or similar electronic tools to collect information to assign each visitor a unique, random number as a User Identification (User ID) to understand the User's individual interests using the identified computer. By continuing to visit the App/Site, you are agreeing to the use of cookies and similar technologies for the purposes we describe in this Policy. If you prefer not to receive cookies or web beacons, then you should stop using Services, or consult your browsing and third-party cookie settings. We use cookies and other technologies for analyzing and optimizing our websites as well as for marketing purposes. Our partners may also assign their own cookies to your browser, a process that we do not control.

Link to third-party sites/ad-servers

The Site may include links to other websites such as advertisers, blogs, content sponsorships, vendor services, social networks, etc. Such websites are governed by their respective privacy policies, which are beyond our control. Once you leave our servers (you can tell where you are by checking the URL in the location bar on your browser), the use of any information you provide is governed by the privacy policy of the operator of the site you are visiting and we make no representation or warranty on how your information is stored or used on third-party servers. That policy may differ from ours. If you can't find the privacy policy of any of these sites via a link from the website's homepage, you should contact the website directly for more information.

Information sharing

The Information (including personal information) collected may be shared with our affiliates, and group companies to the extent required for our internal business and/or administrative purposes and/or general corporate operations and to any third-party service providers including marketing partners, and the User hereby consents to the same. We will take reasonable steps to ensure that these third-party service providers are obligated to protect your personal information and are also subject to appropriate confidentiality/non-disclosure obligations and that they comply with the applicable provisions of the data protection laws. These entities, with whom we share the Information, may market to you as a result of such sharing unless you, the User, explicitly opt out. The User explicitly consents that we may have access to your SMS, contacts in your directory, location and device information and we may request you to provide your CNIC and Know-Your-Customer (KYC) details to check your eligibility for certain products/services including but not limited to Investments, etc., to enhance your experience and provide you access to the services being offered by us, our affiliates or other third-party service providers (including lenders). Further, the User also consents to the sharing of Information (including sensitive personal information) when it is requested or required by law or by any court or governmental agency or authority to disclose; for the purpose of verification of identity, or for the prevention, detection, investigation including cyber incidents, or for prosecution and punishment of offenses. These disclosures are made in good faith and belief that such disclosure is reasonably necessary for enforcing the Terms of Use or for complying with the applicable laws and regulations. No personal information of an individual User such as name, phone number, email address, spending data, card details etc. would be shared with any other User and/or third parties unless explicitly approved by the concerned individual User himself/herself. We may also present information related to credit records, User spends, patterns and User data tracked by us only in the form of aggregated statistics on data such as overall app usage by date, time, balances, etc. within our App/Site or to our partners. By using the Hilal Invest App Services and providing information to us, Users agree and consent to the disclosure, transfer, storage, and processing of the personal information (including sensitive personal information) by us in Pakistan and/or in other countries to its affiliates, group companies and third parties. While our primary motive is to protect the disclosure of personal information (except in accordance with the provisions of this Policy) of Users, Users may note that countries where their Information may be stored, may not have data protection laws similar to the countries where they are located.



Accessing and updating personal information

When Users use the Site (or any of its sub-sites)/App, we make good faith efforts to provide Users, as and when requested by Users, with access to their Information and shall further ensure that any personal information or sensitive personal data or other Information found to be inaccurate or deficient shall be corrected or amended as feasible, subject to any requirement for such personal Information or sensitive personal data or Information to be retained by law or for legitimate business purposes. We ask individual Users to identify themselves and the Information requested to be accessed, corrected or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning Information residing on backup tapes), or for which access is not otherwise required. In any case, where we provide Information access and correction, we perform this service free of charge, except if doing would require a disproportionate effort. Because of the way we maintain certain services after you delete your Information, residual copies may take a certain amount of time before they are deleted from our active servers and may remain in our backup systems.

Information storage and backup

From time to time, we take a backup of your data on the Hilal Invest App on our cloud database. This is done to enable Users to get their data back in case their phone's data becomes unusable, or the phone gets lost, or the User moves to a new phone device. We may also use this backup to provide useful insights and information related to their investment behavior and pattern and to provide information related to investing, patterns and User data in the form of aggregated and anonymized statistics on data such as User spends by category, date, time, bank balances, etc. We shall keep the User's Information in our records till the time when we can potentially offer the Hilal Invest App Services to the Users. After a time when Hilal Invest App Services are no longer relevant to a User, we remove all the Information pertaining to a particular User from our records.

Information security

We take appropriate security measures to protect against unauthorized access to or alteration, disclosure or destruction of data including accidental or intentional manipulation, and loss from access by unauthorized parties. These include internal reviews of our data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where we store personal data. All Information gathered on the Hilal Invest App is securely stored within the controlled database. Access to the servers is password-protected and is strictly limited. Our security measures are regularly reviewed and updated to reflect technological developments. Regardless of where your personal information is transferred or stored, we take all steps reasonably necessary to ensure that personal information is kept secure, however, please understand that no transmission of data over the internet or any other public network can be guaranteed to be 100% (one hundred per cent) secure. We seek to ensure compliance with the requirements of the applicable data protection laws to ensure the protection and preservation of the User's privacy and personal Information. We have physical, electronic, and

procedural safeguards that comply with the laws prevalent in specific jurisdictions to protect User's Personal Information. By accepting the terms of this Policy, you agree that the standards and practices being implemented by us, are reasonable and sufficient for the protection of your personal information. We will contact you regarding any breach of the security, confidentiality, or integrity of your unencrypted electronically stored Personal Information to you via email or any other feasible manner in the most expedient time possible and without unreasonable delay, insofar as consistent with the legitimate needs of law enforcement and will undertake all measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

Purpose of Data Processing

We will only collect and process Personal Information about you where we have a lawful basis to do so. Our primary purpose in collecting your information, including Personal Information from you is to deliver the personalized Hilal Invest App and its various features. Please note that should you choose to not provide us consent to collect your information, including Personal Information, we may not be able to perform the contract with you. Where we refer to 'perform the contract' we mean the Terms of Use applicable to your use of the Hilal Invest Service, which means that you may either not be able to access certain features of the Hilal Invest Service or we may not be able to provide you with the Hilal Invest Service in entirety. For example, we use your information where we need the Personal Information to perform the contract with you (for example, to provide the Platform or our services to you) to:

- Register you on our Platform
- Provide you with customer or technical support including addressing support queries related to, but not limited to, payment processing, or diagnosing any problems with our servers etc.
- Send you transactional emails/SMS or to provide you with information, direct marketing, online and offline advertising and other materials regarding products, services and other offers from time to time in connection with the Hilal Invest Service or Its parent, subsidiary and affiliated companies ("Platform Entities") and its joint ventures.
- Determine your geographic location, to provide you localized content including advertisements, and personalized recommendations, allow you to continue watching/using previous content at another time, and to determine your Internet service provider to troubleshoot a technical issue, and help us quickly and efficiently respond to inquiries and requests;
- To provide you with personalized service and experience; we do this by linking some or all of your Personal Information such as transactions done with Hilal Invest with your activity on our Platform across all your devices and associating and storing this information with a unique platform-generated identifier that is generated for each user (guest as well as a registered user). When a guest user subsequently registers and creates an account, the information and data relating to such user's past activities get added to and associated with the registered account.
- In other contexts, if the processing of your Personal Information is subject to the EU General Data Protection Regulation, we use your Personal Information where the processing is in our legitimate interests and not overridden by your fundamental rights and freedoms (for example, our direct marketing activities in accordance with your

preferences) such as to: Display or target advertisements on the Platform based on your registration or profile information, location and/or your activity on the Platform across all your streaming devices (including inferred information through usage and log data) which is associated with your device advertising identifier (IDFA, GAID etc) – this is typically referred to as ‘interestbased advertising. We also display contextual advertisements on the Platform but these are not targeted to any particular user and do not make use of any information that personally identifies you or precisely locates you (contextual advertising is advertising that we target based on the content being viewed, for example, if you are watching a particular sporting event, we may serve adverts of companies or products related to that particular sport or the age-group most likely to be watching). •Research, analyze and understand our audience and what content and advertising they may view, watch or otherwise engage with, to improve our service (including our user interface experiences and security features); evaluate your eligibility for certain types of offers, products or services and market such products or services to you; to perform analytics and conduct customer research, including general market research or surveying our customers’ needs and opinions on specific issues, generating sales and traffic patterns, and to analyze advertising effectiveness, both on an anonymous basis (e.g., by aggregating data) or on an individual basis (if legally permissible), in combination with other information collected from tracking technologies and aggregate with information collected from other Users using our Platform, to attempt to provide you with the Services and a better experience on the Platform. For example, one of the ways we use this information is to count the number of times an advert or other content is viewed because this might be the metric by which our advertisers pay us. This information is compiled and analyzed on an aggregated basis.

- Analyze and measure how effective our advertising is by determining which media sources should be paid for delivering a desired action e.g. users who install our application or subscribe (also known as ‘attribution’) so that we pay for demonstrated value and don’t overspend.
- We will use your Personal Information with your explicit consent as follows:
- When you agree to share your precise location based on GPS data, we will combine this information with other information that you provide to us on the Hilal invest Service to provide personalized content and advertisements with better accuracy basis your geographic location e.g. you may see more regional content recommendations or advertisements for local establishments when you share your precise location based on GPS data;
- When you agree to share information on the applications frequently used by you on your device, we will combine this information with other information that you provide to us on the Hilal Invest Service, to display advertisements that are more relevant to your interest areas.
- Or otherwise, whenever the law requires us to get your permission or where we have stated we may seek your permission in this Privacy Notice. In some contexts, we use your Personal Information where we have a legal obligation to do so or to protect your vital interests or those of another person: •Prevent, detect and investigate potentially prohibited or illegal activities, including fraud, and enforce our terms (such as determining free trial eligibility);
- Confirming your identity if you are exercising legal rights;



- Notify you about changes in the Terms of Use or this Privacy Notice,
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us/our distributor.
- When you access or use the Services or send any data, query, request or communication to us via our Support email, you understand that you are communicating with us electronically and that we may respond via electronic means from us, such as by email.

Revocation of consent

A User can revoke his consent to the processing of his personal information at any time with effect for the future. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal information where such collection, use and disclosure without consent is permitted or required under applicable laws.

Responsible organization for the data collection

All the Hilal Invest App Services are currently provided and regulated by Al Hilal Securities (Private) Limited and therefore Al Hilal Securities (Private) Limited is responsible for the collection, storage and processing of personal information of the Users, except the information being collected by our third-party service providers after obtaining express consent from the Individual Users who shall provide such data either directly to us to be forwarded to our third-party service providers, or directly to such third party service providers.

Updates/Changes

We may alter our Policy from time to time to incorporate necessary changes in technology, applicable law or any other variant. In any case, we reserve the right to change (at any point in time) the terms of this Policy or the Terms of Use. Any changes we make will be effective immediately on notice, which we may give by posting the new policy on the Site. Your use of the Hilal Invest App Services after such notice will be deemed acceptance of such changes. We may also make reasonable efforts to inform you via electronic mail. In any case, you are advised to review this Policy periodically on the Site to ensure that you are aware of the latest version.



Questions/Grievance Redressal

In the event you have any grievance relating to the processing of Information provided by you, you may contact our Grievance Officer at help@hilalinvest.com or write to us at the following address: Al Hilal Securities Advisors (Private) Limited, Suites 406-407, 4th floor, Horizon Tower, Khayaban-e-Saadi, Block 3 Clifton, Karachi.

Disclaimer

In case any personal information is shared by you with us, which is not requested by us during registration, (whether mandatory or optional), we will not be liable for any information security breach or disclosure concerning such information. If you have any questions regarding this Policy or the protection of your personal information, please contact our data protection officer/grievance officer.